



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 8-2614-00205/01801  
Mod 0 Effective Date: 01/01/2012 Expiration Date: 12/31/2016  
Mod 1 Effective Date: 01/01/2015 Expiration Date: 12/31/2016  
Mod 2 Effective Date: 08/15/2013 Expiration Date: 12/31/2016

Permit Issued To: EASTMAN KODAK CO  
343 STATE ST  
ROCHESTER, NY 14650

Contact: BRYAN P GALLAGHER  
EASTMAN KODAK CO  
1999 LAKE AVE  
ROCHESTER, NY 14652  
(585) 588-7483

Facility: EASTMAN BUSINESS PARK  
1999 LAKE AVE  
ROCHESTER, NY 14652

Contact: BRYAN P GALLAGHER  
EASTMAN KODAK CO  
1999 LAKE AVE  
ROCHESTER, NY 14652  
(585) 588-7483

Description:  
Modification of the current Title V Facility Permit, renewed effective January 1, 2012, for Eastman Kodak Company - Eastman Business Park Operations.

Changes in facility operations have reduced the number of Emission Units (EU) to 22 from the 29 EU in the January 1, 2012 Permit. Some were removed due to process and equipment sales to new owners (EU U-00020 to Truesense Imaging, and EU U-00008 and F-AC002 to RED-Rochester). Others (EU U-00011 and U-00061) were deleted to reflect the decommissioning of the acetate film production area in Buildings 53 and 54. Kodak has also re-organized equipment and EU changes result. For example, EU U-00045 remaining equipment is now included in EU U-00084. EU U-00048 (small scale synthetic chemical operations) has been eliminated with the few remaining sources moved to EU U-00060 in Building 337. One new emission unit, EU U-00090, was added for new Touch Screen Manufacturing operations, and has been updated under Operational Flexibility provisions.



On September 4, 2013 Kodak submitted a Subpart 228-1 Compliance Plan in accordance with the provisions of the June 2013 revisions of the Subpart 228-1 Surface Coating Processes rule. As a result of the rule changes, many rule citations in this 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, this Permit includes approval of a new Coating System for the Bldg 48 Coating Machine.

Other Permit modifications from the Permit effective January 1, 2012 include:

Elimination of the 39 ton per year volatile organic compound (VOC) cap on EU U-00085:

U-00085 operations in Building 59 are plastic and paper web coating and related operations. A VOC cap of 39 tons per year was included in the previous Title V permit for U-00085 to limit emissions resulting from a 2002 equipment upgrade project to less than the threshold for applicability to 40 CFR 52.21 PSD and 6 NYCRR Part 231-2 NSR requirements. The majority of equipment related to this project is now shut down. The remaining sources have potential VOC emissions less than 1 ton per year - well below the 40 ton per year threshold for NSR. Therefore, the cap and associated record keeping requirements are no longer necessary and have been removed.

Operational Flexibility Changes:

These reflect non-significant operational changes and deletions approved by the Department since January 1, 2012, under the Operational Flexibility provisions of the Title V Permit.

A Minor Modification:

A Minor Modification to the Title V Facility Permit, to authorize construction and operation of a new Emission Unit for Touch Screen Sensor manufacturing was issued August 15, 2013. Touch Screen Sensor manufacturing involves plating and printing circuits on flexible film. Operations include chemical plating, corona discharge film treatment, flexographic printing, ultraviolet curing, drying, and parts washing. Touch Screen Emission Unit potential emissions are less than 8 tons of VOC per year, less than 6 tons of HAP per year and less than 2 tons of PM per year. The Department determined that the addition of touch screen operations met the definition of a minor permit modification in Part 201-6.6(c).

Changes to reflect recent revisions of regulations:

These do not involve changes in operations, but include changes in rule citations and monitoring conditions due to revisions to 6 NYCRR Part 201-6 for all Title V Facility Permits, as well as to 6 NYCRR Part 228-1 for Surface Coating Processes as indicated above.



New and revised monitoring conditions have been included for the Building 120 methanol / water scrubber system (EU U-00021) to demonstrate compliance with the 40 CFR 63 Subpart FFFF MON MACT rule. Testing in November 2013 showed a removal efficiency greater than the 95% required 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.

RACT and BACT Condition Changes:

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 Permit was renewed on January 1, 2012. Several of the previous 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 Permit for the Emission Units:

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.

The elimination of EU U-00048 batch chemical production operations also removes its Part 212.10 VOC RACT limit and its Part 212.4 BACT limit from the Permit.

None of the remaining VOC RACT limits have been changed from the previously permitted limits. This Permit has a single change in the remaining Part 212 BACT limits. A minor modification was proposed to increase the Part 212 BACT limit for acetone and methyl acetate emitted from EU U-00084 coating operations from 4.38 tons per year to 25 tons per year. Based on an evaluation submitted in March 2014, no further emission reductions were both technically and economically feasible. The change will allow a coating machine, which was used for research and development only, to be used for production. All the remaining Part 212 BACT alternate limits are unchanged in this Permit.

Emission Reduction Credits (ERC):



Under terms of a Consent Agreement and Final Order issued by USEPA in November 2011, Kodak agreed to surrender 62.1 tons of VOC ERC documented in the Current Title V Permit. The Permit adds language stating that these ERC were surrendered. These surrendered VOC ERC are no longer available for new emission offsets or netting.

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

Permit Administrator:           SCOTT SHEELEY  
  NYSDEC - REGION 8  
  6274 E AVON-LIMA RD  
  AVON, NY 14414

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



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

**Facility Level**

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



**DEC GENERAL CONDITIONS**

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

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

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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

**Item 3.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

**Item 4.1:**

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

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

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

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

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466



**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



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

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: EASTMAN KODAK CO  
343 STATE ST  
ROCHESTER, NY 14650

Facility: EASTMAN BUSINESS PARK  
1999 LAKE AVE  
ROCHESTER, NY 14652

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

Mod 0 Permit Effective Date: 01/01/2012

Permit Expiration Date: 12/31/2016

Mod 2 Permit Effective Date: 08/15/2013

Permit Expiration Date: 12/31/2016

Mod 1 Permit Effective Date: 01/01/2015

Permit Expiration Date: 12/31/2016



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 1-1 6 NYCRR 201-6.4 (a) (7): Fees
- 1-2 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 1-3 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 1-4 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 1-5 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 1-6 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 1-7 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 1-8 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 1-9 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 1-10 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 1-11 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 19 6 NYCRR 202-1.1: Required Emissions Tests
- 20 40 CFR Part 68: Accidental release provisions.
- 21 40 CFR 82, Subpart F: Recycling and Emissions Reduction
- 22 6 NYCRR 200.3: False statement
- 23 6 NYCRR Subpart 201-6: Compliance Schedule for Unpermitted Sources
- 24 6 NYCRR Subpart 201-6: Emission Unit Definition
- 1-12 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 1-13 6 NYCRR 201-6.4 (f): Compliance Certification
- 1-14 6 NYCRR 201-6.4 (f): Compliance Certification
- 28 6 NYCRR Part 207: Submittal of Episode Action Plans
- 29 6 NYCRR 211.1: Air pollution prohibited
- 30 6 NYCRR 212.5 (e): Sources meeting Federal requirements, satisfy Part 212 compliance for regulated contaminant
- 1-15 6 NYCRR 228-1.1 (a) (3): Once in always in
- 1-16 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 1-17 6 NYCRR 228-1.3 (e) (2): Compliance Certification
- 1-18 6 NYCRR 228-1.6 (a): Compliance Certification
- 1-19 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 1-20 6 NYCRR 228-1.6 (h): Compliance Certification
- 1-21 6 NYCRR 231-2.12: EP 129-1 VOC Emission Reduction Credits
- 1-22 6 NYCRR 231-2.12: EP 29-U7 VOC Emission Reduction Credits
- 1-23 6 NYCRR 231-2.12: EP 303A6 VOC Emission Reduction Credits
- 40 6 NYCRR 231-11.2 (b): Compliance Certification
- 41 6 NYCRR 231-11.2 (c): Compliance Certification
- 42 40 CFR 61, NESHAP Subpart M: National Emission Standard for Asbestos
- 43 40 CFR 61.342(a), NESHAP Subpart FF: Compliance Certification

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- 44 40CFR 61.356(a), NESHAP Subpart FF: Recordkeeping
- 45 40CFR 61.356(b)(1), NESHAP Subpart FF: Compliance Certification
- 46 40CFR 61.357(a), NESHAP Subpart FF: Compliance Certification
- 47 40CFR 61.357(b), NESHAP Subpart FF: Compliance Certification
- 1-24 40CFR 63.2520, Subpart FFFF: Compliance Certification
- 1-25 40CFR 63.2535(l), Subpart FFFF: Compliance Certification
- 1-26 40CFR 63.2540, Subpart FFFF: Compliance Certification
- 1-27 40CFR 63.8075(e), Subpart HHHHH: Compliance Certification
- 1-28 40CFR 63.8095, Subpart HHHHH: Compliance Certification
- 61 40CFR 63.3340, Subpart JJJJ: Compliance Certification
- 1-29 40CFR 63.3370(c), Subpart JJJJ: Compliance Certification
- 1-30 40CFR 63.3400(c)(2), Subpart JJJJ: Compliance Certification
- 1-31 40CFR 63.3410(a), Subpart JJJJ: Compliance Certification
- 65 40 CFR 64.7: Compliance Certification
- 66 40 CFR 64.8: Compliance Certification
- 67 40 CFR 64.9: Compliance Certification

**Emission Unit Level**

- 68 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 69 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**EU=F-AC001**

- 70 6 NYCRR Part 226: Compliance Certification

**EU=F-AC003**

- 73 40CFR 63.6665, Subpart ZZZZ: Compliance Certification

**EU=F-AC003,Proc=SIL**

- 83 6 NYCRR 227-1.3 (a): Compliance Certification
- 84 40CFR 63.6602, Subpart ZZZZ: Compliance Certification
- 85 40CFR 63.6625(e), Subpart ZZZZ: Compliance Certification
- 86 40CFR 63.6625(f), Subpart ZZZZ: Compliance Certification
- 87 40CFR 63.6625(h), Subpart ZZZZ: Compliance Certification
- 88 40CFR 63.6640(f)(1), Subpart ZZZZ: Compliance Certification
- 89 40CFR 63.6655(f), Subpart ZZZZ: Compliance Certification

**EU=U-00009**

- 166 40CFR 63, Subpart FFFF: Compliance Certification
- 167 40CFR 63, Subpart FFFF: Compliance Certification
- 168 40CFR 63, Subpart FFFF: Compliance Certification
- 169 40CFR 63.2435(d), Subpart FFFF: Compliance Certification
- 1-32 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 170 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 171 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 172 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 173 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 175 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 176 40CFR 63.2470(d), Subpart FFFF: Compliance Certification
- 177 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 178 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 179 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 180 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 181 40CFR 63.2480, Subpart FFFF: Compliance Certification

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- 182 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 183 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 184 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 185 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 186 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 187 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 188 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 189 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 190 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 191 40CFR 63.2485(j), Subpart FFFF: Compliance Certification
- 192 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 193 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 194 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 195 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 196 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 197 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00009,Proc=H12**

- 198 6 NYCRR 236.2 (c): Compliance with Federal regulations
- 199 40CFR 63.2535(h), Subpart FFFF: Compliance with 40 CFR Part 60, subpart DDD, III, NNN, or RRR
- 200 40CFR 63.2535(k), Subpart FFFF: Compliance with 40 CFR 60 Subpart VV and 40 CFR 61 Subpart V
- 220 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00012,Proc=P04**

- 221 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00012,Proc=P15**

- 222 6 NYCRR 229.3 (e) (2) (v): Compliance Certification
- 223 6 NYCRR 229.5 (d): Compliance Certification

**EU=U-00012,EP=03054,Proc=P03,ES=030AC**

- 224 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00012,EP=03055,Proc=P03,ES=030AD**

- 225 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00012,EP=03062,Proc=P03,ES=030AH**

- 226 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00012,EP=030L0,Proc=P03,ES=030AM**

- 227 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00012,EP=030L1,Proc=P03,ES=030AN**

- 228 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00012,EP=030L4,Proc=P03,ES=030AQ**

- 229 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00012,EP=030M9,Proc=P03,ES=030AV**

- 230 6 NYCRR 212.4 (c): Compliance Certification

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**EU=U-00012,EP=030N1,Proc=P04,ES=030AW**

1-33 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

1-34 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00016**

233 40CFR 63.8000(b), Subpart HHHHH: Compliance Certification

**EU=U-00016,EP=082X7**

1-35 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00021**

1-36 6 NYCRR 201-6.4 (f) (1): Compliance Certification

244 6 NYCRR 229.3 (e) (2) (v): Compliance Certification

1-37 6 NYCRR 229.5 (d): Compliance Certification

245 40CFR 63.2342(b), Subpart EEEE: Compliance Certification

1-38 40CFR 63.2343, Subpart EEEE: Compliance Certification

247 40CFR 63.2346(c), Subpart EEEE: Compliance Certification

249 40CFR 63.2378, Subpart EEEE: Compliance Certification

1-39 40CFR 63.2386, Subpart EEEE: Compliance Certification

250 40CFR 63.2390, Subpart EEEE: Compliance Certification

1-40 40CFR 63.2398, Subpart EEEE: Compliance Certification

**EU=U-00021,Proc=H81**

252 40CFR 63.2435(d), Subpart FFFF: Compliance Certification

1-41 40CFR 63.2450(e), Subpart FFFF: Compliance Certification

1-42 40CFR 63.2450(e), Subpart FFFF: Compliance Certification

1-43 40CFR 63.2450(e), Subpart FFFF: Compliance Certification

1-44 40CFR 63.2450(e), Subpart FFFF: Compliance Certification

1-45 40CFR 63.2450(e), Subpart FFFF: Compliance Certification

257 40CFR 63.2450(e), Subpart FFFF: Compliance Certification

259 40CFR 63.2455(b), Subpart FFFF: Compliance Certification

1-46 40CFR 63.2460(b), Subpart FFFF: Compliance Certification

261 40CFR 63.2470(a), Subpart FFFF: Compliance Certification

262 40CFR 63.2470(d), Subpart FFFF: Compliance Certification

263 40CFR 63.2475, Subpart FFFF: Compliance Certification

264 40CFR 63.2480, Subpart FFFF: Compliance Certification

265 40CFR 63.2480, Subpart FFFF: Compliance Certification

266 40CFR 63.2480, Subpart FFFF: Compliance Certification

267 40CFR 63.2480, Subpart FFFF: Compliance Certification

268 40CFR 63.2480, Subpart FFFF: Compliance Certification

269 40CFR 63.2480, Subpart FFFF: Compliance Certification

270 40CFR 63.2480, Subpart FFFF: Compliance Certification

271 40CFR 63.2480, Subpart FFFF: Compliance Certification

272 40CFR 63.2480, Subpart FFFF: Compliance Certification

273 40CFR 63.2485, Subpart FFFF: Compliance Certification

274 40CFR 63.2485, Subpart FFFF: Compliance Certification

275 40CFR 63.2485, Subpart FFFF: Compliance Certification

276 40CFR 63.2485, Subpart FFFF: Compliance Certification

277 40CFR 63.2485(j), Subpart FFFF: Compliance Certification

278 40CFR 63.2490, Subpart FFFF: Compliance Certification

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- 279 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 1-47 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 280 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 281 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 283 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 284 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00021,EP=11601**

- 1-48 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

**EU=U-00021,EP=12007**

- 1-49 6 NYCRR 212.10 (c) (4) (i): Compliance Certification

**EU=U-00021,EP=12007,Proc=H81**

- 1-50 40CFR 63, Subpart FFFF: Compliance Certification

**EU=U-00021,EP=120A5**

- 1-51 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

**EU=U-00021,EP=14201**

- 1-52 6 NYCRR 212.10 (c) (4) (i): Compliance Certification

**EU=U-00021,EP=14201,Proc=H80**

- 1-53 40CFR 63.2346(a), Subpart EEEE: Compliance Certification

**EU=U-00021,EP=14201,Proc=H81**

- 1-54 40CFR 63, Subpart FFFF: Compliance Certification
- 1-55 6 NYCRR 212.4 (c): Compliance Certification
- 1-56 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00023,Proc=H07**

- 294 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 295 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 296 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 297 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 298 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 299 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 300 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 301 40CFR 63.2485(j), Subpart FFFF: Compliance Certification
- 302 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 303 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 304 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00023,EP=112A1,Proc=H06,ES=112AC**

- 305 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00024**

- 1-57 6 NYCRR 201-6.4 (f) (1): Compliance Certification

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1-58 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00024**

308 40CFR 60, NSPS Subpart A: Applicability of General Provisions of 40 CFR 60 Subpart A

**EU=U-00024,Proc=E52**

1-59 6 NYCRR 212.4 (c): Compliance Certification

1-60 6 NYCRR 212.4 (c): Compliance Certification

1-61 6 NYCRR 212.4 (c): Compliance Certification

310 6 NYCRR 212.4 (c): Compliance Certification

312 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00024,Proc=E55**

1-62 6 NYCRR 228-1.3 (a): Compliance Certification

1-63 6 NYCRR 228-1.3 (d): Compliance Certification

1-64 6 NYCRR 228-1.4 (d) (3): Compliance Certification

**EU=U-00024,Proc=E63,ES=351AP**

1-65 6 NYCRR 227-2.4: Compliance Certification

1-66 6 NYCRR 227-2.4 (d): Compliance Certification

324 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Certification

325 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Certification

**EU=U-00024,EP=317W3,Proc=E52,ES=317DL**

332 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00024,EP=317X5**

333 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00024,EP=317X7**

1-67 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00024,EP=351C8,Proc=E63,ES=351AP**

335 6 NYCRR 227-1.3 (a): Compliance Certification

**EU=U-00025**

336 6 NYCRR 233.3: Compliance Certification

337 6 NYCRR 233.3 (g): Compliance Certification

338 40CFR 63.2460(b), Subpart FFFF: Compliance Certification

339 40CFR 63.2465(b), Subpart FFFF: Compliance Certification

1-68 40CFR 63.2480, Subpart FFFF: Compliance Certification

340 40CFR 63.2480, Subpart FFFF: Compliance Certification

341 40CFR 63.2480, Subpart FFFF: Compliance Certification

343 40CFR 63.2480, Subpart FFFF: Compliance Certification

344 40CFR 63.2480, Subpart FFFF: Compliance Certification

345 40CFR 63.2480, Subpart FFFF: Compliance Certification

346 40CFR 63.2480, Subpart FFFF: Compliance Certification

347 40CFR 63.2480, Subpart FFFF: Compliance Certification

348 40CFR 63.2480, Subpart FFFF: Compliance Certification

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- 349 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 350 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 351 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 353 40CFR 63.2485(j), Subpart FFFF: Compliance Certification
- 354 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 355 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 356 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 357 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 358 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 359 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00025,Proc=S05**

- 360 6 NYCRR 212.4 (c): Compliance Certification
- 361 6 NYCRR 212.6 (a): Compliance Certification
- 1-69 6 NYCRR 212.4 (c): Compliance Certification
- 1-70 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00047,Proc=P61**

- 1-71 6 NYCRR 228-1.3 (a): Compliance Certification
- 1-72 6 NYCRR 228-1.3 (d): Compliance Certification
- 1-73 6 NYCRR 228-1.5 (d): Compliance Certification
- 1-74 6 NYCRR 228-1.5 (d): Compliance Certification

**EU=U-00047,EP=03810,Proc=P65,ES=038AB**

- 1-75 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

**EU=U-00047,EP=03816,Proc=P65,ES=038AG**

- 1-76 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

**EU=U-00047,EP=03818**

- 373 6 NYCRR 231-2.2 (d) (3): Compliance Certification
- 401 6 NYCRR 212.4 (c): Compliance Certification
- 402 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00053**

- 403 6 NYCRR 233.3: Compliance Certification
- 404 6 NYCRR 233.3 (g): Compliance Certification
- 1-77 6 NYCRR 233.3 (h) (1): Compliance Certification
- 406 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 1-78 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 408 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 409 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 410 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 411 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 412 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 413 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 414 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 415 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 416 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 417 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 418 40CFR 63.2485, Subpart FFFF: Compliance Certification



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- 419 40CFR 63.2485(j), Subpart FFFF: Compliance Certification
- 420 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00053,Proc=I35**

- 1-79 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification
- 422 40CFR 63.2450(k)(3), Subpart FFFF: Compliance Certification
- 423 40CFR 63.2460(b), Subpart FFFF: Compliance Certification
- 424 40CFR 63.2465(b), Subpart FFFF: Compliance Certification
- 425 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 426 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 427 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 428 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 429 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00053,Proc=I35,ES=325AT**

- 430 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00053,Proc=I47**

- 431 6 NYCRR 229.3 (e) (2) (v): Compliance Certification
- 432 6 NYCRR 229.5 (d): Compliance Certification

**EU=U-00053,EP=325X3**

- 434 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00053,EP=325X3,Proc=I35,ES=325AP**

- 1-80 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 435 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 436 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 1-81 40CFR 63.2465(c)(1), Subpart FFFF: Compliance Certification
- 1-82 40CFR 63.2465(c)(1), Subpart FFFF: Compliance Certification
- 439 40CFR 63.2465(c)(1), Subpart FFFF: Compliance Certification
- 441 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00056**

- 442 6 NYCRR 233.3: Compliance Certification
- 443 6 NYCRR 233.3 (g): Compliance Certification
- 444 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 445 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 446 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 447 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 448 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 449 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 1-83 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 450 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 451 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 452 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 453 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 454 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00056,Proc=I33**

- 1-84 40CFR 63.2480, Subpart FFFF: Compliance Certification

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- 456 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 457 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 458 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00056,Proc=I48**

- 459 6 NYCRR 229.3 (e) (2) (v): Compliance Certification
- 460 6 NYCRR 229.5 (d): Compliance Certification

**EU=U-00056,EP=304A8**

- 461 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification
- 462 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00056,EP=304A8,Proc=I33**

- 463 6 NYCRR 212.4 (c): Compliance Certification
- 464 6 NYCRR 212.6 (a): Compliance Certification
- 1-85 6 NYCRR 212.4 (c): Compliance Certification
- 1-86 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00060**

- 1-87 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification
- 466 6 NYCRR 233.3: Compliance Certification
- 467 6 NYCRR 233.3 (g): Compliance Certification
- 468 6 NYCRR 233.3 (h) (1): Compliance Certification
- 1-88 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 469 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 470 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 471 40CFR 63.2450(e), Subpart FFFF: Compliance Certification
- 473 40CFR 63.2450(k)(3), Subpart FFFF: Compliance Certification
- 474 40CFR 63.2460(b), Subpart FFFF: Compliance Certification
- 475 40CFR 63.2465(b), Subpart FFFF: Compliance Certification
- 1-89 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 476 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 477 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 479 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 480 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 481 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 482 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 483 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 484 40CFR 63.2480, Subpart FFFF: Compliance Certification
- 485 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 486 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 487 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 488 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 489 40CFR 63.2485, Subpart FFFF: Compliance Certification
- 490 40CFR 63.2485(j), Subpart FFFF: Compliance Certification
- 491 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 492 40CFR 63.2490, Subpart FFFF: Compliance Certification
- 493 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 494 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 495 40CFR 63.2525, Subpart FFFF: Compliance Certification
- 496 40CFR 63.2525, Subpart FFFF: Compliance Certification



497 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00060,Proc=I24**

498 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,Proc=I25**

499 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,Proc=I27,ES=304AA**

500 6 NYCRR 212.4 (c): Compliance Certification

501 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,Proc=I27,ES=304AB**

502 6 NYCRR 212.4 (c): Compliance Certification

503 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,Proc=I28**

504 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,Proc=I49**

505 6 NYCRR 229.3 (e) (2) (v): Compliance Certification

506 6 NYCRR 229.5 (d): Compliance Certification

**EU=U-00060,Proc=I52**

1-90 40CFR 63.8000(a), Subpart HHHHH: Overall requirements for subpart HHHHH

1-91 40CFR 63.8015, Subpart HHHHH: Compliance Certification

1-92 40CFR 63.8030, Subpart HHHHH: Heat exchanger provisions - referral to HON rule

**EU=U-00060,EP=303A8,Proc=I26**

508 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00060,EP=303A8,Proc=I26,ES=303AE**

509 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,EP=303X1**

1-93 40CFR 63.2465(c)(1), Subpart FFFF: Compliance Certification

1-94 40CFR 63.2465(c)(1), Subpart FFFF: Compliance Certification

1-95 40CFR 63.2465(c)(1), Subpart FFFF: Compliance Certification

**EU=U-00060,EP=303X2,Proc=I26**

513 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00060,EP=30403,Proc=I27**

514 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00060,EP=304B0**

1-96 40CFR 63.2465(a), Subpart FFFF: Compliance Certification

515 40CFR 63.2465(a), Subpart FFFF: Compliance Certification

517 40CFR 63.2465(a), Subpart FFFF: Compliance Certification

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**EU=U-00060,EP=304B0,Proc=I45**

518 6 NYCRR 231-2.2 (d) (3): Compliance Certification  
519 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00060,EP=304B0,Proc=I45,ES=30410**

520 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,EP=304B0,Proc=I45,ES=30411**

521 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00060,EP=304B0,Proc=I45,ES=30417**

522 40 CFR Part 64: Compliance Certification

**EU=U-00060,EP=304X1**

1-97 40CFR 63.2465(a), Subpart FFFF: Compliance Certification  
524 40CFR 63.2465(a), Subpart FFFF: Compliance Certification  
525 40CFR 63.2465(a), Subpart FFFF: Compliance Certification

**EU=U-00075,EP=08224**

527 6 NYCRR 212.4 (c): Compliance Certification  
528 6 NYCRR 212.6 (a): Compliance Certification  
1-98 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00083,EP=08138,Proc=Y10,ES=081BJ**

1-99 6 NYCRR 212.4 (c): Compliance Certification  
1-100 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00083,EP=082X8,Proc=Y14,ES=082BM**

1-101 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00083,EP=205C5,Proc=Y14,ES=205CX**

1-102 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00084**

1-103 6 NYCRR 201-6.4 (f) (1): Compliance Certification  
530 6 NYCRR 212.4 (c): Compliance Certification  
531 6 NYCRR 212.6 (a): Compliance Certification  
1-104 6 NYCRR 228-1.3 (d): Compliance Certification

**EU=U-00084**

536 6 NYCRR 231-2.2 (d) (3): Compliance Certification  
1-105 40CFR 63.829(f), Subpart KK: Compliance Certification

**EU=U-00084,Proc=G02,ES=308AB**

538 6 NYCRR 227-1.3 (a): Compliance Certification

**EU=U-00084,Proc=G08**

1-106 6 NYCRR 228-1.3 (a): Compliance Certification  
1-107 6 NYCRR 228-1.4 (d) (3): Compliance Certification

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**EU=U-00084,Proc=G09**

1-108 6 NYCRR 228-1.3 (a): Compliance Certification

**EU=U-00084,Proc=G10**

1-109 6 NYCRR 228-1.3 (a): Compliance Certification

1-110 6 NYCRR 228-1.5 (e): Compliance Certification

**EU=U-00084,EP=08212**

1-111 6 NYCRR 231-2.2 (d) (3): Compliance Certification

**EU=U-00084,EP=308B7,Proc=G05**

541 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

**EU=U-00085**

1-112 6 NYCRR 201-6.4 (f) (1): Compliance Certification

1-113 6 NYCRR 212.4 (c): Compliance Certification

1-114 6 NYCRR 212.6 (a): Compliance Certification

1-115 6 NYCRR 228-1.3 (d): Compliance Certification

**EU=U-00085,Proc=S21**

1-116 6 NYCRR 228-1.4 (d) (3): Compliance Certification

**EU=U-00085,Proc=S29**

1-117 6 NYCRR 228-1.3 (a): Compliance Certification

**EU=U-00085,EP=059K4,Proc=S21,ES=059AX**

1-118 6 NYCRR 228-1.3 (a): Compliance Certification

1-119 6 NYCRR 212.4 (c): Compliance Certification

1-120 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00087,Proc=N10**

1-121 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00087,Proc=N40,ES=349DA**

586 6 NYCRR 229.3 (e) (2) (v): Compliance Certification

587 6 NYCRR 229.5 (d): Compliance Certification

**EU=U-00087,Proc=N43**

588 6 NYCRR 229.3 (e) (2) (v): Compliance Certification

589 6 NYCRR 229.5 (d): Compliance Certification

**EU=U-00087,EP=349D2,Proc=N10,ES=349CA**

590 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00087,EP=349E0,Proc=N10,ES=349CK**

591 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00087,EP=349H4,Proc=N44,ES=349EG**

592 6 NYCRR 212.4 (c): Compliance Certification

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**EU=U-00087,EP=349H9,Proc=N44,ES=349EL**

593 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-00089**

594 40CFR 63.2485(j), Subpart FFFF: Compliance Certification

595 40CFR 63.2525, Subpart FFFF: Compliance Certification

596 40CFR 63.2525, Subpart FFFF: Compliance Certification

597 40CFR 63.2525, Subpart FFFF: Compliance Certification

**EU=U-00089,EP=082X6,Proc=S11**

1-122 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00089,EP=082X6,Proc=S11,ES=082CA**

1-123 6 NYCRR 212.4 (c): Compliance Certification

1-124 6 NYCRR 212.4 (c): Compliance Certification

1-125 6 NYCRR 212.6 (a): Compliance Certification

**EU=U-00090,Proc=Z02**

1-126 6 NYCRR 234.5: Compliance Certification

1-127 6 NYCRR 234.6: Compliance Certification

1-128 6 NYCRR 234.7: Compliance Certification

**EU=U-00090,Proc=Z03**

1-129 6 NYCRR 229.3 (e) (2) (v): Compliance Certification

1-130 6 NYCRR 229.5 (d): Compliance Certification

**EU=U-00090,EP=326C6,Proc=Z02,ES=326BN**

1-131 6 NYCRR 234.8: Compliance Certification

**EU=U-00090,EP=326C7**

1-132 6 NYCRR 212.10 (c) (4) (i): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

598 ECL 19-0301: Reporting Requirements for State-Only Enforceable Conditions

599 ECL 19-0301: Contaminant List

1-133 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

601 6 NYCRR 211.2: Visible Emissions Limited

602 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

603 6 NYCRR 212.5 (d): Less restrictive permissible emission rate possible if BACT applied

**Emission Unit Level**

**EU=F-AC004**

605 6 NYCRR 228-2.4: Compliance Demonstration

**EU=F-AC004,Proc=AD1**

606 6 NYCRR 228-2.3 (e): Compliance Demonstration

607 6 NYCRR 228-2.3 (f) (1): Compliance Demonstration

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- 608 6 NYCRR 228-2.3 (f) (3): Compliance Demonstration
- 609 6 NYCRR 228-2.3 (f) (4): Compliance Demonstration
- 610 6 NYCRR 228-2.3 (h): Compliance Demonstration
- 611 6 NYCRR 228-2.3 (i): No person shall solicit, require the use or specify the application of noncomplaint products.
- 612 6 NYCRR 228-2.5 (a): Compliance Demonstration
- 613 6 NYCRR 228-2.7 (b): Container Labeling

**EU=F-AC004,Proc=AD2**

- 614 6 NYCRR 228-2.4: Compliance Demonstration
- 615 6 NYCRR 228-2.7 (b): Container Labeling

**EU=F-AC004,Proc=AD3**

- 616 6 NYCRR 228-2.5 (d): Compliance Demonstration

**EU=U-00021,EP=11601**

- 1-134 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00021,EP=12007**

- 1-135 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00021,EP=120A5**

- 1-136 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00021,EP=14201**

- 1-137 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00047,EP=03816,Proc=P65,ES=038AG**

- 1-138 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00053,EP=325X3**

- 1-139 6 NYCRR 212.4 (a): Compliance Demonstration

- 643 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00056,EP=304A8**

- 1-140 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060**

- 1-141 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060,EP=303A8**

- 647 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060,EP=303B1**

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648 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060,EP=303X1**

649 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060,EP=304B0**

650 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060,EP=304B0,Proc=I45**

651 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060,EP=304X1**

652 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00060,EP=304X2**

653 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00084**

1-142 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00084,EP=308B5**

1-143 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-00090,EP=326C7**

1-144 6 NYCRR 212.4 (a): Compliance Demonstration





**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

**Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

**Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)**

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

**Item H: Severability - 6 NYCRR 201-6.4 (a) (9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item I: Permit Shield - 6 NYCRR 201-6.4 (g)**

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

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

ii. The liability of a permittee of the Title V



facility for any violation of applicable requirements prior to or at the time of permit issuance;

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

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

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

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

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

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

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

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

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

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



a shorter time period in the case of an emergency.

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

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

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

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

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

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

**Condition 1: Acceptable Ambient Air Quality  
Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 200.6**

**Item 1.1:**

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

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emission control required.

**Condition 1-1: Fees**

**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-1.1:**

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

**Condition 1-2: Recordkeeping and Reporting of Compliance Monitoring**

**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-2.1:**

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

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

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

**Condition 1-3: Records of Monitoring, Sampling, and Measurement**

**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-3.1:**

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



**Condition 1-4: Compliance Certification**  
Effective between the dates of 01/01/2015 and 12/31/2016

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

**Item 1-4.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 60 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

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

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



report required above.

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

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

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

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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate



whether or not the Department or EPA has approved the results.

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-5: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-5.1:**  
The Compliance Certification activity will be performed for the Facility.

**Item 1-5.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

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

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





specified in any special permit terms or conditions;  
and  
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

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

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

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

The address for the RAPCE is as follows:

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

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April  
15th each year for emissions of the previous calendar  
year.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 8.1:**

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission  
statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the  
department upon request during normal business hours.

**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 215.2**



**Item 9.1:**

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

**Item 9.2**

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

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

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

**The following federally enforceable permit conditions are mandatory for all**



**Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

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

**Condition 10: Maintenance of Equipment**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 10.1:**

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

**Condition 1-6: Recycling and Salvage**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Replaces Condition(s) 11**

**Item 1-6.1:**

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

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 12.1:**

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

**Condition 1-7: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Replaces Condition(s) 13**

**Item 1-7.1:**

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



**Condition 1-8: Trivial Sources - Proof of Eligibility**  
Effective between the dates of 01/01/2015 and 12/31/2016

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

**Replaces Condition(s) 14**

**Item 1-8.1:**

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

**Condition 1-9: Requirement to Provide Information**  
Effective between the dates of 01/01/2015 and 12/31/2016

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

**Item 1-9.1:**

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

**Condition 1-10: Right to Inspect**  
Effective between the dates of 01/01/2015 and 12/31/2016

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

**Item 1-10.1:**

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

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.



**Condition 1-11: Off Permit Changes**

Effective between the dates of 01/01/2015 and 12/31/2016

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

**Item 1-11.1:**

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

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

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

**Condition 19: Required Emissions Tests**

Effective between the dates of 01/01/2012 and 12/31/2016

Applicable Federal Requirement:6 NYCRR 202-1.1

**Item 19.1:**

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

**Condition 20: Accidental release provisions.**

Effective between the dates of 01/01/2012 and 12/31/2016

Applicable Federal Requirement:40 CFR Part 68

**Item 20.1:**

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

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

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

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

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

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

**Condition 21: Recycling and Emissions Reduction**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 21.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

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

**Condition 22: False statement**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 200.3**

**Item 22.1:**

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

**Condition 23: Compliance Schedule for Unpermitted Sources**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 23.1:**

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

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**Condition 24: Emission Unit Definition**  
Effective between the dates of 01/01/2012 and 12/31/2016

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

**Item 24.1(From Mod 1):**

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

Emission Unit: U-00009

Emission Unit Description:

DISTILLING WEST MANUFACTURING OPERATIONS, INCLUDING DISTILLATION EQUIPMENT, STORAGE TANKS, MISCELLANEOUS ORGANIC CHEMICAL MANUFACTURING EQUIPMENT SUBJECT TO MON MACT, AND ASSOCIATED FUGITIVE EMISSIONS.

Building(s): 322

**Item 24.2(From Mod 1):**

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

Emission Unit: U-00012

Emission Unit Description:

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

Building(s): 030  
046

**Item 24.3(From Mod 1):**

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

Emission Unit: U-00016

Emission Unit Description:

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

Building(s): 082

**Item 24.4(From Mod 1):**

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

Emission Unit: U-00021

Emission Unit Description:

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



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Building(s): 115  
116  
120  
142

**Item 24.5(From Mod 1):**

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

Emission Unit: U-00023

Emission Unit Description:

SPID, MATERIALS HANDLING, MILLING AND  
MIXING OPERATIONS, AND ASSOCIATED FUGITIVE  
EMISSIONS.

Building(s): 082  
103  
112

**Item 24.6(From Mod 1):**

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

Emission Unit: U-00024

Emission Unit Description:

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

Building(s): 317  
335  
351

**Item 24.7(From Mod 1):**

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

Emission Unit: U-00025

Emission Unit Description:

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

Building(s): 305

**Item 24.8(From Mod 1):**

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

Emission Unit: U-00032

Emission Unit Description:

FINISHING OPERATIONS INCLUDING  
PERFORATING, SLITTING, SPOOLING, LABELING  
AND PACKAGING OPERATIONS WITH INCIDENTAL  
FUGITIVE EMISSIONS

Building(s): 326

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**Item 24.9(From Mod 1):**

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

Emission Unit: U-00047

Emission Unit Description:

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

Building(s): 038

**Item 24.10(From Mod 1):**

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

Emission Unit: U-00053

Emission Unit Description:

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

Building(s): 325

**Item 24.11(From Mod 1):**

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

Emission Unit: U-00056

Emission Unit Description:

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.

Building(s): 304

**Item 24.12(From Mod 1):**

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

Emission Unit: U-00060

Emission Unit Description:

BUILDING 301, 303, 304 & 337 BATCH  
SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS  
INCLUDING DRYING, SEPARATING, BLENDING,  
MATERIAL TRANSFER AND STORAGE, WITH  
PROCESSES SUBJECT TO BUILDING WIDE VOC RACT  
CAP AND MON MACT, INCLUDING ASSOCIATED  
FUGITIVE EMISSIONS.

Building(s): 301

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303  
304  
337

**Item 24.13(From Mod 1):**

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

Emission Unit: U-00083

Emission Unit Description:

SOURCES IN BUILDINGS 81, 82 AND 205  
ASSOCIATED WITH MISCELLANEOUS MANUFACTURING  
OPERATIONS.

Building(s): 081  
082  
205

**Item 24.14(From Mod 1):**

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

Emission Unit: U-00084

Emission Unit Description:

BUILDING 59, 82 & 308 BASE MANUFACTURING  
AND/OR WEB COATING OF PLASTIC/PAPER, AND  
RELATED SUPPORT OPERATIONS.

Building(s): 059  
082  
308

**Item 24.15(From Mod 1):**

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

Emission Unit: U-00085

Emission Unit Description:

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

Building(s): 059

**Item 24.16(From Mod 1):**

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

Emission Unit: U-00087

Emission Unit Description:

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

Building(s): 349

**Item 24.17(From Mod 1):**

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

Emission Unit: U-00089

End Date: 08/17/2016

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Emission Unit Description:

SMALL SCALE CHEMICAL MANUFACTURING  
OPERATIONS, AND ASSOCIATED FUGITIVE  
EMISSIONS SUBJECT TO MON MACT (SUBPART  
FFFF)

Building(s): 082

**Item 24.18(From Mod 1):**

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

Emission Unit: U-00090

Emission Unit Description:

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

Building(s): 326

**Item 24.19(From Mod 0):**

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

Emission Unit: F-AC001

Emission Unit Description:

FACILITY EMISSION UNIT FOR SOLVENT METAL  
PARTS CLEANERS AND ASSOCIATED FUGITIVE  
EMISSIONS.

Building(s): FACILITY

**Item 24.20(From Mod 0):**

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

Emission Unit: F-AC003

Emission Unit Description:

FACILITY EMISSION UNIT FOR EMERGENCY  
STATIONARY RECIPROCATING INTERNAL  
COMBUSTION ENGINES (RICE) AND ASSOCIATED  
FUGITIVE EMISSIONS.

Building(s): FACILITY

**Item 24.21(From Mod 0):**

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

Emission Unit: F-AC004

Emission Unit Description:

FACILITY EMISSION UNIT FOR USE OF  
ADHESIVES, SEALANTS, ADHESIVE PRIMERS &  
SEALANT PRIMERS

Building(s): FACILITY

**Item 24.22(From Mod 0):**

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

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Emission Unit: U-00075

End Date: 05/19/2016

Emission Unit Description:

SOLDERING OPERATIONS AND EQUIPMENT WITH  
INCIDENTAL INDOOR FUGITIVE EMISSIONS

Building(s): 082

**Condition 1-12: Progress Reports Due Semiannually**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-12.1:**

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

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

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

**Condition 1-13: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-13.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-13.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In addition to the NESHAP for which specific conditions are included elsewhere in the Title V permit, the following NESHAP has been determined to apply to Kodak operations at Eastman Business Park:

40 CFR 63 Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters)

As required, Kodak operations at Eastman Business Park shall comply with the above listed NESHAP and any associated requirements in 40 CFR 63 Subpart A by the



corresponding compliance date and/or other deadline specified for each of the above rules. After submitting an initial notification for any NESHAP not included on the above list, or beforehand, if Kodak has completed an applicability determination, Kodak shall submit a request under the Operational Flexibility provisions established in this permit to update the list above. In addition, should Kodak later determine that one of the NESHAP listed above does not apply, or alternatively once the detailed compliance requirements from a NESHAP listed above have been incorporated into the Title V permit at the appropriate level, Kodak may use the Operational Flexibility provisions to ask that this NESHAP be removed from the list.

Compliance certifications submitted according to 201-6.5 must include details for each applicable NESHAP whose compliance date has passed, even if the permit has not yet been modified to incorporate detailed compliance requirements for that NESHAP. This condition does not eliminate any obligations for Kodak to request a revision to this permit for any "modifications" as defined in Part 200 (e.g. installing a control device) that may be required in order to comply with the NESHAP.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-14: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-14.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-14.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

I. Protocol Objective

The objective of this condition is to maximize operational flexibility for Kodak operations at Eastman Business Park by building into the Title V Permit the capability to make



certain changes using a protocol. As provided under 6 NYCRR Part 201-6.4(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.6.

## II. Applicability

A. The following types of changes may be reviewed under this protocol, except as prohibited under II.B or III.A below:

1. New emission sources,
2. 6 NYCRR Part 200 "modifications",
3. Emission point relocations, and
4. Changes that otherwise could be handled under the minor permit modification process in 6 NYCRR Part 201-6.6.

B. This protocol does not apply to the following changes:

1. Any project defined as major in 6 NYCRR 621.4(g);
2. Any significant permit modification as that term is defined in 6 NYCRR 201-6.6(d); or
3. Any change that would exceed the emissions allowable under the permit whether expressed as a rate or in terms of total emissions.

## III. Protocol

### A. Criteria

Kodak shall evaluate changes reviewed under this protocol in accordance with the following criteria:

1. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. The new or changed source will be associated with an existing emissions unit, process, emission source or emission point that has the necessary regulatory citations. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or, subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

2. Any new or changed emission source shall not be part of a source project that results in a significant net emissions increase that exceeds the NSR thresholds identified in 6 NYCRR Part 231-2 or 40 CFR 52.21. Kodak will submit documentation of major NSR program



non-applicability for NYSDEC review and approval consistent with the advance notification provisions of Section III.B. below.

3. Kodak shall not use the protocol to make physical changes or changes in the method of operation of existing emission sources that would require a new federally enforceable cap either to avoid major New Source Review requirements or to address and comply with other Clean Air Act requirements such as RACT. Such changes must be addressed via the significant permit modification provisions.

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

1. Kodak shall notify the Department in writing at least 30 calendar days in advance of making any changes reviewed under the protocol which meet the criteria above. When the change is to a source subject to a federally applicable requirement, the EPA administrator shall be notified in a similar manner.

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

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

b. Description of the proposed change;

c. If appropriate, the identification and description of emissions control technology and compliance terms;

d. Documentation of the project's or emission source's compliance with respect to all state and/or federally applicable requirements according to an established procedure which includes the following steps:

i. For new emission sources, identify all contaminants and calculate the emission rate potential and maximum projected actual annual emission rates after the proposed change. For changes to existing emission sources, emission rate potential and maximum projected actual annual emission rates shall be provided for all contaminants affected by the change.

ii. Indicate the environmental rating for each contaminant identified in III.B.2.d.i as previously





established by the Department or proposed based on the current DAR-1 Ambient Guideline Concentration Table or toxicological review.

iii. Provide the rationale for determining that major NSR does not apply which may include: 1) an explanation that the change is not a source project or modification under 40 CFR 52.21, 2) calculations that demonstrate that the emissions increase from the project alone is not significant or, 3) calculations that demonstrate that the net emissions increase for the contemporaneous period is not significant.

iv. Model facility-wide emissions, including emissions from the proposed project, using the approved dispersion model known as the Kodak Air Resources Evaluation System (KARES) or another model approved in advance by the Department. Maximum projected actual annual emission rates consistent with current permitting will be used in the model.

v. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source, using the emissions information, environmental ratings, modeling results and knowledge of operations.

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

### C. Review and Approval of Changes

1. Kodak will be permitted to proceed with the change 30 days from the Department's receipt of the notification and/or additional information upon prior Departmental approval, whichever is first, unless the Department determines that a more detailed review (in accordance with #3 below) or a permit modification (in accordance with #2 below) is required.

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



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

4. The Department shall respond to the permittee in writing with a determination under #2 or 3 above within 15 days of receipt of the notification and/or additional information from the permittee.

**D. Additional Compliance Obligations for Changes Made Under this Protocol**

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

2. On a semi-annual basis, Kodak shall provide a summary of the changes made in accordance with this protocol during the corresponding period and a statement of the compliance status of each.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 28: Submittal of Episode Action Plans**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 28.1:**

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

**Condition 29: Air pollution prohibited**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 29.1:**

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No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**Condition 30: Sources meeting Federal requirements, satisfy Part 212 compliance for regulated contaminant Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.5 (e)**

**Item 30.1:**

A process emission source, subject to the Federal new source performance standards in 40 CFR Part 60, the national emission standards for hazardous air pollutants in 40 CFR part 61, or to the polychlorinated biphenyl disposal criteria in 40 CFR Part 761 satisfies the requirements of this Part for the contaminant regulated by the Federal standard if the source owner can demonstrate that the source is in compliance with the respective Federal regulation.

**Condition 1-15: Once in always in Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 228-1.1 (a) (3)**

**Item 1-15.1:**

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

**Condition 1-16: Surface Coating- Prohibitions Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-16.1:**

This Condition applies to:

Emission Unit: U00024  
Process: E55

Emission Unit: U00047  
Process: P61

Emission Unit: U00084  
Process: G08



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Emission Unit: U00084  
Process: G10

Emission Unit: U00085  
Process: S21

**Item 1-16.2:**

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

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

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

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

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

**Condition 1-17: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (e) (2)**

**Item 1-17.1:**

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

Emission Unit: U-00084

Emission Unit: U-00085

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 1-17.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak may use up to 55 gallons of coatings  
(facility-wide) on a 12-month rolling total basis which do  
not comply with the VOC content limits set forth in

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Section 228-1.4. These certain coatings are used in surface coating operations in the Emission Units identified above. In accordance with Section 228-1.3(b)(2), the facility must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. All records required shall be maintained at the facility for five years and made available to the Department upon request.

The Operational Flexibility provisions included in permit may be used to update the list of Emission Units above that use this exemption.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-18: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-18.1:**  
The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00024  
Process: E55

Emission Unit: U-00047  
Process: P61

Emission Unit: U-00084  
Process: G08

Emission Unit: U-00085  
Process: S21

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 1-18.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must

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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 EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-19: Surface coating access for sampling**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-19.1:**

This Condition applies to:

Emission Unit: U00024  
Process: E55

Emission Unit: U00047  
Process: P61

Emission Unit: U00084  
Process: G08

Emission Unit: U00084  
Process: G10

Emission Unit: U00085  
Process: S21

**Item 1-19.2:**

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

**Condition 1-20: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-20.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-20.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-21: EP 129-1 VOC Emission Reduction Credits  
Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 231-2.12**

**Replaces Condition(s) 37**

**Item 1-21.1:**

An Emission Reduction Credit (ERC) of 4.6 tons of VOC has been established due to the removal of small scale synthesis of organic chemicals that formerly occurred in labs 19 and 21 in Building 129, which has been demolished. The Emission Reduction Date is July 1, 1992. To assure that these emission reductions are permanent, these operations which were vented through EP 129-1 shall not be operated at this facility in the future.

These Emission Reduction Credits were surrendered and removed from the registry in accordance with a CONSENT AGREEMENT AND FINAL ORDER with USEPA, dated November 10, 2011 (Matter #CAA-02-2011-1209).

**Condition 1-22: EP 29-U7 VOC Emission Reduction Credits  
Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 231-2.12**

**Replaces Condition(s) 38**

**Item 1-22.1:**

An Emission Reduction Credit (ERC) of 55.6 tons of VOC has been established due to the shutdown of the film coating machine vented through EP 29-U7. The Emission Reduction Date is October 31, 1994. To assure that these emission reductions are permanent, the film coating machine that was vented through EP 29-U7 shall not be operated at this facility in the future.

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These Emission Reduction Credits were surrendered and removed from the registry in accordance with a CONSENT AGREEMENT AND FINAL ORDER with USEPA, dated November 10, 2011 (Matter #CAA-02-2011-1209).

**Condition 1-23: EP 303A6 VOC Emission Reduction Credits**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 231-2.12**

**Replaces Condition(s) 39**

**Item 1-23.1:**

An Emission Reduction Credit (ERC) of 1.9 tons of VOC has been established due to the shutdown of EP 303A6, which had consisted of tanks PV-479, 485, 486 & 487 (all of which have been removed from service and destroyed). The Emission Reduction Date is October 30, 1994. To assure that these emission reductions are permanent, these tanks which were vented through EP 303A6 shall not be operated at this facility in the future.

These Emission Reduction Credits were surrendered and removed from the registry in accordance with a CONSENT AGREEMENT AND FINAL ORDER with USEPA, dated November 10, 2011 (Matter #CAA-02-2011-1209).

**Condition 40: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 231-11.2 (b)**

**Item 40.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 40.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a modification where the projected actual annual emissions (rather than the potential to emit) is used to determine the project emission potential, and (1) the project emission potential which is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13 of Part 231, or (2) the project emission potential when added to emissions excluded in accordance with 231-4.1(b)(40)(i)(c) is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13, the facility owner or operator, in addition to complying with any requirements under 6 NYCRR Part 201, must maintain the following information for a minimum of five years:

(1) A description of the modification.





(2) An identification of each new or modified emission source(s) including the associated processes and emission unit.

(3) The calculation of the project emission potential for each modified emission source(s) including supporting documentation.

(4) The date the modification commenced operation.

These recordkeeping requirements apply to exempt and trivial activities but do not affect their exempt or trivial permitting status under 6 NYCRR Part 201-3. The facility must submit these records to the Department, upon the Department's request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 41: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-11.2 (c)**

**Item 41.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a modification where the projected actual emissions (rather than the potential to emit) is used to determine the project emission potential, and (1) the project emission potential is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of 6 NYCRR Part 231-13, but equals or exceeds 50 percent of the applicable significant project threshold when emissions excluded in accordance with 231-4.1(b)(40)(i)(c) are added, or (2) the project emission potential equals or exceeds 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of 6 NYCRR Part 231-13, the facility owner or operator must submit an application to modify the facility permit under the minor permit provisions of 6 NYCRR Part 201-6 or obtain a preconstruction permit under the provisions of Subpart 201-6, and must:

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(1) maintain the following information for a minimum of five years:

(i) a description of the modification.

(ii) an identification of each new or modified emission source(s) including the associated processes and emission unit.

(iii) the calculation of the project emission potential for each modified emission source(s) including supporting documentation.

(iv) the date the modification commenced operation.

(2) monitor the emissions of each regulated NSR contaminant from the emission source(s) that will increase as a result of the modification, and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the modification, or for a period of 10 years following resumption of regular operations after the change if the modification increases the design capacity of or potential to emit the regulated NSR contaminant at such emission source(s).

(3) submit a report to the department within 30 days after the end of each year during which records must be generated in accordance with 6 NYCRR 231-11.2(c)(2). The report must contain:

(i) the name, address, and telephone number of the major facility.

(ii) the annual emissions as calculated pursuant to 6 NYCRR 231-11.2(c)(2).

(iii) a comparison of actual annual emissions to the projected actual emissions and, if applicable, an explanation as to why the actual annual emissions exceeded the projected actual emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 42: National Emission Standard for Asbestos  
Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 42.1:**

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



**Condition 43: Compliance Certification**

Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 40CFR 61.342(a), NESHAP Subpart FF**

**Item 43.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000071-43-2 BENZENE

**Item 43.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

(A) An owner or operator of a facility at which the total annual benzene quantity from facility waste is less than 10 megagrams per year (Mg/yr) shall be exempt from the requirements of 40 CFR §§61.342(b) and (c) as well as the specific standards and monitoring requirements in §§61.343 through 61.354. The total annual benzene quantity from facility waste is the sum of the annual benzene quantity for each waste stream at the facility that has a flow-weighted annual average water content greater than 10 percent or that is mixed with water, or other wastes, at any time and the mixture has an annual average water content greater than 10 percent. The benzene quantity in a waste stream is to be counted only once without multiple counting if other waste streams are mixed with or generated from the original waste stream. Other specific requirements for calculating the total annual benzene waste quantity are as follows:

(1) Wastes that are exempted from control under §§61.342(c)(2) and 61.342(c)(3) are included in the calculation of the total annual benzene quantity if they have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.

(2) The benzene in a material subject to 40 CFR 63 Subpart FF that is sold is included in the calculation of the total annual benzene quantity if the material has an annual average water content greater than 10 percent.

(3) Benzene in wastes generated by remediation activities conducted at the facility, such as the excavation of contaminated soil, pumping and treatment of groundwater, and the recovery of product from soil or groundwater, are not included in the calculation of total annual benzene quantity for that facility. If the



facility is managing remediation waste generated offsite, the benzene in this waste shall be included in the calculation of total annual benzene quantity in facility waste, if the waste streams have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.

(4) The total annual benzene quantity is determined based upon the quantity of benzene in the waste before any waste treatment occurs to remove the benzene except as specified in §§61.355(c)(1)(i) (A) through (C).

(B) Per §61.342(g), compliance with 40 CFR 61 Subpart FF will be determined by review of facility records and results from tests and inspections using methods and procedures specified in 40 CFR §61.355 as follows:

(1) For each waste stream subject to Subpart FF having a flow-weighted annual average water content greater than 10 percent water, on a volume basis as total water, or is mixed with water or other wastes at any time and the resulting mixture has an annual average water content greater than 10 percent as specified in §61.342(a), the owner or operator shall:

(i) Determine the annual waste quantity for each waste stream using the procedures specified in Section (B) of this condition.

(ii) Determine the flow-weighted annual average benzene concentration for each waste stream using the procedures specified in Section (D) of this condition.

(iii) Calculate the annual benzene quantity for each waste stream by multiplying the annual waste quantity of the waste stream times the flow-weighted annual average benzene concentration.

(2) Total annual benzene quantity from facility waste is calculated by adding together the annual benzene quantity for each waste stream generated during the year and the annual benzene quantity for each process unit turnaround waste annualized according to §61.355(b)(4).

(3) If the total annual benzene quantity from facility waste is less than 10 Mg/yr but is equal to or greater than 1 Mg/yr, then the owner or operator shall:

(i) Comply with the recordkeeping requirements of §61.356 and reporting requirements of §61.357 of this subpart; and

(ii) Repeat the determination of total annual benzene quantity from facility waste at least once per year and whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 10 Mg/yr or more.

(4) If the total annual benzene quantity from facility waste is less than 1 Mg/yr, then the owner or operator shall:

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(i) Comply with the recordkeeping requirements of §61.356 and reporting requirements of §61.357 of Subpart FF; and

(ii) Repeat the determination of total annual benzene quantity from facility waste whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr or more.

(C) For purposes of the calculation required by Section (B) of this condition, the owner or operator shall determine the annual waste quantity at the point of waste generation, unless otherwise provided in paragraphs (b) (1), (2), (3), and (4) of §61.355, by one of the methods given in paragraphs 1 through 3 as follows:

(1) Select the highest annual quantity of waste managed from historical records representing the most recent 5 years of operation or, if the facility has been in service for less than 5 years but at least 1 year, from historical records representing the total operating life of the facility;

(2) Use the maximum design capacity of the waste management unit; or

(3) Use measurements that are representative of maximum waste generation rates.

(D) For the purposes of the calculation required by Section (B) of this condition, the owner or operator shall determine the flow-weighted annual average benzene concentration in a manner that meets the requirements given in §61.355(c)(1) using either of the methods given in §§61.355(c)(2) and (c)(3). (I.e., knowledge of the waste or measurements of benzene concentrations.)

Parameter Monitored: MASS FLOW RATE

Upper Permit Limit: 10 Megagrams (10\*\*6 grams)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 44: Recordkeeping**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 61.356(a), NESHAP Subpart FF**

**Item 44.1:**

The owner or operator shall comply with the recordkeeping requirements of §61.356. Each record shall be maintained in a readily accessible location at the facility site for a period not less

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than two years from the date the information is recorded unless otherwise specified.

**Condition 45: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 61.356(b)(1), NESHAP Subpart FF**

**Item 45.1:**  
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000071-43-2 BENZENE

**Item 45.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The owner or operator shall 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. In addition the owner or operator shall maintain the following records. For each waste stream not controlled for benzene emissions in accordance with Subpart FF, the records shall include all test results, measurements, calculations, and other documentation used to determine the following information for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene concentrations, annual average flow-weighted benzene concentration, and annual benzene quantity.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 12 calendar month(s).

**Condition 46: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 61.357(a), NESHAP Subpart FF**

**Item 46.1:**  
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000071-43-2 BENZENE



**Item 46.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a chemical plant, petroleum refinery, coke by-product recovery plant, and any facility managing wastes from these industries shall submit to the Administrator within 90 days after January 7, 1993, or by the initial startup for a new source with an initial startup after the effective date, a report that summarizes the regulatory status of each waste stream subject to Sec. 61.342 and is determined by the procedures specified in Sec. 61.355(c) to contain benzene. Each owner or operator subject to this subpart who has no benzene onsite in wastes, products, by-products, or intermediates shall submit an initial report that is a statement to this effect. For all other owners or operators subject to this subpart, the report shall include the following information:

(1) Total annual benzene quantity from facility waste determined in accordance with Sec. 61.355(a) of this subpart.

(2) A table identifying each waste stream and whether or not the waste stream will be controlled for benzene emissions in accordance with the requirements of this subpart.

(3) For each waste stream identified as not being controlled for benzene emissions in accordance with the requirements of this subpart the following information shall be added to the table:

(i) Whether or not the water content of the waste stream is greater than 10 percent;

(ii) Whether or not the waste stream is a process wastewater stream, product tank drawdown, or landfill leachate;

(iii) Annual waste quantity for the waste stream;

(iv) Range of benzene concentrations for the waste stream;

(v) Annual average flow-weighted benzene concentration for the waste stream; and

(vi) Annual benzene quantity for the waste stream.

(4) The information required in paragraphs (a) (1), (2), and (3) of this section should represent the waste stream characteristics based on current configuration and operating conditions. An owner or operator only needs to list in the report those waste streams that contact materials containing benzene. The report does not need to include a description of the controls to be installed to comply with the standard or other information required in Sec. 61.10(a).

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 47: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 61.357(b), NESHAP Subpart  
FF**

**Item 47.1:**  
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000071-43-2 BENZENE

**Item 47.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

If the total annual benzene quantity from facility waste is less than 1 Mg/yr, then the owner or operator shall submit to the Administrator a report that updates the information listed in paragraphs (a)(1) through (a)(3) of this section 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-24: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2520, Subpart FFFF**

**Replaces Condition(s) 56**

**Item 1-24.1:**  
The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00009

Emission Unit: U-00021



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Emission Unit: U-00023

Emission Unit: U-00025

Emission Unit: U-00053

Emission Unit: U-00056

Emission Unit: U-00060

Emission Unit: U-00089

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-24.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall submit semiannual Compliance Reports for the Miscellaneous Organic Chemical Manufacturing (MON) NESHAP covering the periods January 1 through June 30 and July 1 through December 31 of each year. The reports shall be submitted by August 31 and February 28, respectively.

The compliance report must contain the information in paragraphs 1 through 10 below:

- (1) Company name and address.
- (2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
- (3) Date of report and beginning and ending dates of the reporting period.
- (4) For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.
- (5) The compliance report must contain the information on any instance in which Kodak:
  - (A) Fails to meet any requirement or obligation established by the MON MACT including, but not limited to, any emission limit, operating limit, or work practice standard; or



(B) Fails to meet any term or condition that is adopted to implement an applicable MON MACT requirement that is included in this permit; or

(C) Fails to meet any MON MACT emission limit, operating limit, or work practice standard during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted.

(i) If there are no deviations from any MON MACT emission limit, operating limit or work practice standard, Kodak shall include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

(ii) For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where Kodak is not using a continuous monitoring system (CMS) to comply with the MON MACT emission limit or work practice standard, Kodak must include the following information (including periods of SSM):

(a) The total operating time of the affected source during the reporting period.

(b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(c) Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.

(iii) For each deviation from a MON MACT emission limit or operating limit where Kodak is using a CMS to comply with a MON MACT emission limit, Kodak must include the following information (including periods of SSM):

(a) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(b) The date, time, and duration that each CEMS was out-of-control, including start and end dates and hours and descriptions of corrective actions taken.

(c) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(d) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total operating time of the affected source during that reporting period.

(e) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process



problems, other known causes, and other unknown causes.

(f) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the affected source during that reporting period.

(g) An identification of each HAP that is known to be in the emission stream.

(h) A brief description of the process units.

(i) A brief description of the CMS.

(j) The date of the latest CMS certification or audit.

(k) Operating logs of processes with batch vents from batch operations for each day(s) during which the deviation occurred.

(l) The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred.

(iv) If Kodak has documented in its notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, Kodak shall include the records associated with each calculation required by §63.2525(e) that exceeds an applicable HAP usage or emissions threshold.

(6) If there were no periods during which a CEMS was out-of-control, Kodak shall include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.

(7) Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, Kodak must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. A revised operating scenario for an existing process is considered to be a new operating scenario.

(8) Records of primary product re-determinations.

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(9) Applicable records and information for periodic reports as specified in 40CFR Part 63 Subparts F, G, H, SS, UU, WW, and GGG and 40 CFR Part 65 Subpart F.

(10) Notification of process change.

(A) Whenever Kodak makes a process change, or changes any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, Kodak must document the change in the next compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the following information:

- (i) A description of the process change.
- (ii) Revisions to any of the information reported in the original notification of compliance status report.
- (iii) Information required by the notification of compliance status report for changes involving the addition of processes or equipment at the affected source.

(B) Kodak must submit a report 60 days before the scheduled implementation date of any of the following changes:

- (i) Any change to the information contained in the precompliance report.
- (ii) A change in the status of a control device from small to large.
- (iii) A change from Group 2 to Group 1 for any emission point except for batch process vents that have operated as Group 2 for at least one year. Kodak shall report changes for batch process vents that have operated as Group 2 for at least one year in the next compliance report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-25: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2535(l), Subpart FFFF**

**Replaces Condition(s) 57**

**Item 1-25.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

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**Item 1-25.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.2535(1) of Subpart FFFF, Kodak has created a process unit group (PUG-1). PUG-1 is a subset of products manufactured in non-dedicated batch process equipment by Synthetic Chemicals operations at Eastman Business Park. PUG-1 includes processes operated in Emission Unit U-00053 and Emission Unit U-00060. Kodak shall maintain records that describe the process units included in PUG-1, the procedure used to create PUG-1, and subsequent changes made to PUG-1.

Kodak shall maintain a record of the initial primary product determination for PUG-1, and all subsequent redeterminations as changes are made to PUG-1. The primary product is the type of product (MON MACT product, Pharmaceutical MACT product, or Pesticide Active Ingredient MACT product) expected to be produced with the greatest production on a mass basis over a 5-year period starting in 2010. At a minimum, Kodak must redetermine the primary product of PUG-1 every 5 years.

If the primary product of PUG-1 is determined to be materials subject to the MON, then all process units in the PUG-1 shall comply with the MON requirements established in this Title V permit. If the primary product is determined to be pharmaceuticals or pesticide active ingredients, then Kodak shall submit an application to add the requirements of these regulations to Kodak's Title V permit.

Kodak may use the Operational Flexibility provisions included in this permit to update the list of Emission Units above that use PUG-1.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-26: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**



**Applicable Federal Requirement: 40CFR 63.2540, Subpart FFFF**

**Replaces Condition(s) 58**

**Item 1-26.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00009

Emission Unit: U-00021

Emission Unit: U-00023

Emission Unit: U-00025

Emission Unit: U-00053

Emission Unit: U-00056

Emission Unit: U-00060

Emission Unit: U-00089

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of affected sources subject to 40CFR63 Subpart FFFF must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 12 of Subpart FFFF. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

The owner or operator of an applicable source using a control device to comply with the emission standard shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM

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plans.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-27: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.8075(e), Subpart HHHHH**

**Replaces Condition(s) 59**

**Item 1-27.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00016

Emission Unit: U-00060

Process: I52

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall submit semiannual Compliance Reports for the Miscellaneous Coating Manufacturing NESHAP covering the periods January 1 through June 30 and July 1 through December 31 of each year. The reports shall be submitted by July 30 and January 30, respectively.

The compliance report shall contain the following items:

- 1) Company name and address
- 2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
- 3) Date of report and beginning and ending dates of the reporting period.
- 4) Applicable records and information for periodic reports as specified in referenced subparts F, SS, TT, UU, and WW of Part 63.



5) For each startup, shutdown, and malfunction (SSM) during which excess emissions occur, the compliance report must include the following information:

- records that the procedures specified in the SSM plan were followed or documentation of actions taken that are not consistent with the SSM plan.
- a description of each malfunction.

6) Information on deviations, as defined in §63.8015, as follows:

i- If there are no deviations from any emission limit, operating limit, or work practice standard specified in subpart HHHHH, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

ii- For each deviation from an emission limit, operating limit, or work practice standard that occurs at an affected source where the facility is not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard, the facility must include:

- a- The total operating time of each affected source during the reporting period.
- b- Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective actions taken.
- c- Operating logs for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.

iii- For each deviation from an emission limit or operating limit occurring at an affected source where the facility is using a CMS to comply with the emission limit, the facility must include the following:

- a- The date and time that each CMS was inoperative, except for two zero (low-level) and high-level checks
- b- The date, time, and duration that each CEMS was out of control, including the information in §63.8(c)(8)
- c- The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period
- d- A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period
- e- A breakdown of the total duration of





the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes

f- A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total source operating time during that reporting period

g- An identification of each HAP that is known to be in the emission stream or wastewater stream, as applicable

h- A description of the product being produced

i- Identification of the CMS

j- The date of the latest CMS certification of audit

k- The operating day or operating block average values of monitored

parameters for each day(s) during which the deviation occurred

7) If the facility uses a CEMS, and there were no periods during which it was out-of-control as specified in §63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.

8) Except as specified below, whenever the facility changes any of the information submitted in either the notification of compliance status report or any previously reported change to the notification of compliance status report, the facility must document the change in the compliance report. The notification must include all of the following information:

- Revisions to any of the information reported in the original notification of compliance status report under §63.8075(d)
- Information required by the notification of compliance status report under §63.8075(d) for changes involving the addition of processes or equipment at the affected source

The facility must submit a report 60 days before the scheduled implementation date of any of the changes identified below:

- Any change to the information contained in either the precompliance report or any previously reported change to the precompliance report.
- A change in the status of a control device from small to large.
- A change in compliance status.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-28: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.8095, Subpart HHHHH**

**Replaces Condition(s) 60**

**Item 1-28.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00016

Emission Unit: U-00060

Process: I52

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-28.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of affected sources subject to 40CFR63 Subpart HHHHH must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 10 of Subpart HHHHH. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

The owner or operator of an applicable source using a control device to comply with the emission standard shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 61: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.3340, Subpart JJJJ**

**Item 61.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 61.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of affected sources subject to 40CFR63 Subpart JJJJ must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 2 of Subpart JJJJ. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

The owner or operator of an applicable source using a control device to comply with the emission standard shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

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**Condition 1-29: Compliance Certification**

Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63.3370(c), Subpart JJJJ**

**Replaces Condition(s) 62**

**Item 1-29.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00024

Emission Unit: U-00047

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-29.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Kodak Operations at Eastman Business Park are subject to 40 CFR 63 Subpart JJJJ, the Paper and Other Web Coating NESHAP. The web coating lines in the emission units listed above constitute the affected source.

In accordance with 63.3370(c)(5)(ii), the affected source is in compliance if it meets at least one of the organic HAP limits specified in 63.3320(b)(2) or 63.3320(b)(3) as indicated below:

To meet the organic HAP emission limit in 63.3320(b)(2), Kodak shall ensure that the monthly average of all coating materials applied on all web coating lines identified as being part of the site-wide affected source shall not exceed 0.04 kg organic HAP/kg coating material applied (4% by weight). Kodak shall determine the organic HAP mass fraction of each coating material "as-purchased" by following one of the options in 63.3360(c)(1-3) (i.e., using Method 311, Method 24 or formulation data). As specified in 63.3370(a)(2)(iii), Kodak shall determine the monthly average organic HAP content of all materials applied by using Equation 4 in 63.3370(c)(3).

To meet the organic HAP emission limit in 63.3320(b)(3), Kodak shall ensure that the monthly average of all coating materials applied on all web coating lines identified as being part of the site-wide affected source shall not exceed 0.20 kg organic HAP/kg coating solids applied (20% by weight). Kodak shall determine the organic HAP mass

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fraction of each coating material "as-purchased" by following one of the options in 63.3360(c)(1-3) (i.e., using Method 311, Method 24 or formulation data). As specified in 63.3370(a)(2)(iv), Kodak shall determine the coating solids content of each "as-purchased" coating material in accordance with the options in 63.3360(d)(1)-(2) (i.e., Method 24 or formulation data) and the monthly average organic HAP content of all materials applied by using Equation 5 in 63.3370(c)(4).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 0.20 kilograms organic HAP per kilogram solids applied

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-30: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.3400(c)(2), Subpart JJJJ**

**Replaces Condition(s) 63**

**Item 1-30.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00024

Emission Unit: U-00047

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall submit semiannual Compliance Reports for the Paper and Other Web Coating NESHAP covering the periods January 1 through June 30 and July 1 through December 31 of each year. The reports shall be submitted by July 30 and January 30, respectively.



The compliance report must contain the information in paragraphs (i) through (vi) below:

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

(v) For each deviation from an emission limitation (emission limit or operating limit) that applies to the facility and that occurs at an affected source where the facility is not using a CEMS to comply with the emission limitations in 40 CFR Part 63 Subpart JJJJ, the compliance report must contain the information in paragraphs (i) through (iii) above, and:

(A) The total operating time of each affected source during the reporting period.

(B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(C) Information on the number, duration, and cause for CPMS down time incidents, if applicable, other than down time associated with zero and span and other calibration checks.

(vi) For each deviation from an emission limit occurring at an affected source where the facility is using a CEMS to comply with the emission limit in this subpart, the facility must include the information in paragraphs (i) through (iii), above, and paragraphs (A) through (J) below.

(A) The date and time that each malfunction started and stopped.

(B) The date and time that each CEMS and CPMS, if applicable, was inoperative except for zero (low-level) and high-level checks.

(C) The date and time that each CEMS and CPMS, if applicable, was out-of-control, including the information in Sec. 63.8(c)(8).

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(D) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(E) A summary of the total duration (in hours) of each deviation during the reporting period and the total duration of each deviation as a percent of the total source operating time during that reporting period.

(F) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(G) A summary of the total duration (in hours) of CEMS and CPMS down time during the reporting period and the total duration of CEMS and CPMS down time as a percent of the total source operating time during that reporting period.

(H) A breakdown of the total duration of CEMS and CPMS down time during the reporting period into periods that are due to monitoring equipment malfunctions, non monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

(I) The date of the latest CEMS and CPMS certification or audit.

(J) A description of any changes in CEMS, CPMS, or controls since the last reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-31: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.3410(a), Subpart JJJJ**

**Replaces Condition(s) 64**

**Item 1-31.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00024

Emission Unit: U-00047

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

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**Item 1-31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each affected source subject to 40 CFR Part 63 Subpart JJJJ, Kodak must maintain the records specified below, on a monthly basis in accordance with the requirements of Sec. 63.10(b)(1):

(i) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(c);

(ii) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(d); and

(iii) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Sec. 63.3370(b), (c), and (d).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 65: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40 CFR 64.7**

**Item 65.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 65.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) Commencement of operation. Kodak shall conduct the monitoring required under this part upon issuance of the Title V Renewal Permit ("Ren 1").

(b) Proper maintenance. At all times, Kodak shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required





quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), Kodak shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. Kodak shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, Kodak shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether Kodak has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) Documentation of need for improved monitoring. If Kodak identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion

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or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 66: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40 CFR 64.8**

**Item 66.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 66.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Based on the results of a determination made under §64.7(d)(2), the Administrator or the permitting authority may require Kodak to develop and implement a Quality improvement plan (QIP) in accordance with the requirements of §64.8.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 67: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40 CFR 64.9**

**Item 67.1:**

The Compliance Certification activity will be performed for the Facility.



**Item 67.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii). A report for monitoring shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

Kodak shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 12 calendar month(s).

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

**Condition 68: Emission Point Definition By Emission Unit**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 68.1(From Mod 1):**

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

Emission Unit: U-00009

Emission Point: 322B1

Height (ft.): 55                      Diameter (in.): 3  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 322

**Item 68.2(From Mod 1):**

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

Emission Unit: U-00012

Emission Point: 03051

Height (ft.): 64                      Length (in.): 14                      Width (in.): 8  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 030

Emission Point: 03054

Height (ft.): 75                      Length (in.): 18                      Width (in.): 18  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 030

Emission Point: 03055

Height (ft.): 125                      Length (in.): 44                      Width (in.): 48  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 030

Emission Point: 03057

Height (ft.): 125                      Length (in.): 44                      Width (in.): 48  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 030

Emission Point: 03059

Height (ft.): 60                      Diameter (in.): 8  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 030

Emission Point: 03062

Height (ft.): 110                      Length (in.): 15                      Width (in.): 20  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 030

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Emission Point: 03078			
Height (ft.): 110	Length (in.): 36	Width (in.): 36	
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030L0			
Height (ft.): 150	Diameter (in.): 17		
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030L1			
Height (ft.): 71	Length (in.): 24	Width (in.): 30	
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030L2			
Height (ft.): 75	Diameter (in.): 12		
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030L3			
Height (ft.): 75	Length (in.): 18	Width (in.): 48	
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030L4			
Height (ft.): 79	Diameter (in.): 17		
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030M5			
Height (ft.): 75	Diameter (in.): 26		
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030M6			
Height (ft.): 121	Diameter (in.): 12		
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 030	
Emission Point: 030M7			
Height (ft.): 149	Length (in.): 12	Width (in.): 21	
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030M9			
Height (ft.): 148	Diameter (in.): 20		
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030N1			
Height (ft.): 150	Length (in.): 38	Width (in.): 41	
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030N4			
Height (ft.): 149	Diameter (in.): 15		
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	
Emission Point: 030N6			
Height (ft.): 149	Length (in.): 14	Width (in.): 10	
NYTMN (km.): 4786.437	NYTME (km.): 284.912	Building: 030	

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Emission Point: 030P0  
Height (ft.): 1 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 030

Emission Point: 030P1  
Height (ft.): 12 Length (in.): 22 Width (in.): 20  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 030

Emission Point: 030P8  
Height (ft.): 107 Length (in.): 12 Width (in.): 12  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 030

Emission Point: 04690  
Height (ft.): 17 Diameter (in.): 20  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 046

**Item 68.3(From Mod 1):**

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

Emission Unit: U-00016

Emission Point: 082X7  
Height (ft.): 120 Length (in.): 48 Width (in.): 36  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 082

**Item 68.4(From Mod 1):**

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

Emission Unit: U-00021

Emission Point: 11601  
Height (ft.): 18 Diameter (in.): 18  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 116

Emission Point: 12007  
Height (ft.): 91 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 120

Emission Point: 120A5 Removal Date: 03/06/2015  
Height (ft.): 45 Diameter (in.): 6  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 120

Emission Point: 120A9  
Height (ft.): 93 Diameter (in.): 2  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 120

Emission Point: 14201  
Height (ft.): 48 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 142

**Item 68.5(From Mod 1):**

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



Emission Unit: U-00023

Emission Point: 08229  
 Height (ft.): 75 Length (in.): 36 Width (in.): 30  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 082

Emission Point: 103A6  
 Height (ft.): 31 Diameter (in.): 16  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 103

Emission Point: 11201  
 Height (ft.): 9 Length (in.): 7 Width (in.): 8  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 112

Emission Point: 112A1  
 Height (ft.): 37 Diameter (in.): 11  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 112

**Item 68.6(From Mod 1):**

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

Emission Unit: U-00024

Emission Point: 31705  
 Height (ft.): 80 Diameter (in.): 6  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 31707  
 Height (ft.): 80 Diameter (in.): 6  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 31709  
 Height (ft.): 80 Diameter (in.): 4  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317E7  
 Height (ft.): 90 Length (in.): 24 Width (in.): 35  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317F0  
 Height (ft.): 75 Diameter (in.): 28  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317F4  
 Height (ft.): 35 Diameter (in.): 4  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317  
 Removal Date: 04/12/2016

Emission Point: 317F6  
 Height (ft.): 35 Diameter (in.): 4  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317  
 Removal Date: 09/09/2015

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Emission Point: 317F8  
Height (ft.): 35 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317G1 Removal Date: 04/12/2016  
Height (ft.): 35 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317G3 Removal Date: 09/09/2015  
Height (ft.): 35 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317G5  
Height (ft.): 35 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317I1  
Height (ft.): 51 Diameter (in.): 8  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317I2  
Height (ft.): 51 Diameter (in.): 8  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317R3  
Height (ft.): 30 Diameter (in.): 2  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317R6 Removal Date: 04/12/2016  
Height (ft.): 54 Length (in.): 23 Width (in.): 17  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317R7  
Height (ft.): 55 Diameter (in.): 13  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317S1  
Height (ft.): 76 Diameter (in.): 17  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317S3  
Height (ft.): 75 Diameter (in.): 25  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317S4 Removal Date: 12/22/2015  
Height (ft.): 88 Diameter (in.): 2  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317T5  
Height (ft.): 46 Diameter (in.): 17  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317



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Emission Point: 317T9  
Height (ft.): 43 Diameter (in.): 69  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317V9  
Height (ft.): 54 Diameter (in.): 3  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317W1  
Height (ft.): 88 Diameter (in.): 3  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317W2  
Height (ft.): 90 Diameter (in.): 4  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317W3  
Height (ft.): 150 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317W4  
Height (ft.): 150 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317W5  
Height (ft.): 40 Diameter (in.): 5  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317X1 Removal Date: 04/12/2016  
Height (ft.): 51 Diameter (in.): 20  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317X3 Removal Date: 09/09/2015  
Height (ft.): 32 Diameter (in.): 19  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317X5  
Height (ft.): 38 Diameter (in.): 26  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317X7  
Height (ft.): 45 Diameter (in.): 32  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317Y3 Removal Date: 04/12/2016  
Height (ft.): 51 Diameter (in.): 8  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 317

Emission Point: 317Y5 Removal Date: 09/09/2015  
Height (ft.): 51 Diameter (in.): 8  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

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Emission Point: 317Y7  
Height (ft.): 51 Diameter (in.): 8  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Y9  
Height (ft.): 93 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z0  
Height (ft.): 107 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z2 Removal Date: 09/09/2015  
Height (ft.): 38 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z3  
Height (ft.): 38 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z4  
Height (ft.): 50 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z5  
Height (ft.): 5 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z6  
Height (ft.): 5 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z8 Removal Date: 04/12/2016  
Height (ft.): 36 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 317Z9  
Height (ft.): 36 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 317

Emission Point: 33501 Removal Date: 09/09/2015  
Height (ft.): 9 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 335

Emission Point: 33502 Removal Date: 09/09/2015  
Height (ft.): 9 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 335

Emission Point: 351C8  
Height (ft.): 75 Diameter (in.): 24  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 351

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Emission Point: 351D0  
Height (ft.): 20 Diameter (in.): 4  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 351

**Item 68.7(From Mod 1):**

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

Emission Unit: U-00025

Emission Point: 30502  
Height (ft.): 22 Diameter (in.): 12  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 305

Emission Point: 30503  
Height (ft.): 22 Length (in.): 12 Width (in.): 21  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 305

Emission Point: 30504  
Height (ft.): 22 Length (in.): 17 Width (in.): 24  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 305

**Item 68.8(From Mod 1):**

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

Emission Unit: U-00032

Emission Point: 326B2  
Height (ft.): 77 Diameter (in.): 14  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326B7  
Height (ft.): 15 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326C1  
Height (ft.): 67 Diameter (in.): 11  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326C2  
Height (ft.): 67 Diameter (in.): 8  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326C3  
Height (ft.): 16 Diameter (in.): 8  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326C4  
Height (ft.): 12 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

**Item 68.9(From Mod 1):**

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



Emission Unit: U-00047

Emission Point: 03802  
Height (ft.): 124 Diameter (in.): 8  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

Emission Point: 03810  
Height (ft.): 155 Diameter (in.): 20  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

Emission Point: 03812  
Height (ft.): 155 Diameter (in.): 18  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

Emission Point: 03813  
Height (ft.): 155 Diameter (in.): 19  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

Emission Point: 03815  
Height (ft.): 138 Diameter (in.): 8  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

Emission Point: 03816  
Height (ft.): 155 Diameter (in.): 21  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

Emission Point: 03817  
Height (ft.): 155 Diameter (in.): 28  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

Emission Point: 03818  
Height (ft.): 125 Diameter (in.): 88  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 038

**Item 68.10(From Mod 1):**

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

Emission Unit: U-00053

Emission Point: 325B3  
Height (ft.): 15 Diameter (in.): 2  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 325

Emission Point: 325X3  
Height (ft.): 29 Diameter (in.): 1  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 325

**Item 68.11(From Mod 1):**

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

Emission Unit: U-00056



Emission Point: 304A7  
 Height (ft.): 6 Diameter (in.): 2  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 304

Emission Point: 304A8  
 Height (ft.): 45 Diameter (in.): 16  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 304

Emission Point: 304A9  
 Height (ft.): 45 Diameter (in.): 3  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 304

**Item 68.12(From Mod 1):**

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

Emission Unit: U-00060

Emission Point: 30105  
 Height (ft.): 34 Diameter (in.): 16  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 301

Emission Point: 301X2  
 Height (ft.): 42 Diameter (in.): 3  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 301

Emission Point: 303A8  
 Height (ft.): 52 Diameter (in.): 21  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 303

Emission Point: 303B1  
 Height (ft.): 47 Diameter (in.): 36  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 303

Emission Point: 303X1  
 Height (ft.): 52 Diameter (in.): 31  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 303

Emission Point: 303X2  
 Height (ft.): 44 Diameter (in.): 2  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 303

Emission Point: 303X3  
 Height (ft.): 44 Diameter (in.): 3  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 303

Emission Point: 30403  
 Height (ft.): 45 Length (in.): 20 Width (in.): 30  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 304

Emission Point: 304A0  
 Height (ft.): 45 Diameter (in.): 32



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NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 304

Emission Point: 304B0  
 Height (ft.): 65 Diameter (in.): 30  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 304

Emission Point: 304X1  
 Height (ft.): 45 Diameter (in.): 37  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 304

Emission Point: 304X2  
 Height (ft.): 65 Diameter (in.): 24  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 304

Emission Point: 337A2  
 Height (ft.): 65 Diameter (in.): 33  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 337

Emission Point: 337A3  
 Height (ft.): 65 Diameter (in.): 33  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 337

Emission Point: 337A4  
 Height (ft.): 50 Diameter (in.): 40  
 NYTMN (km.): 4786.321 NYTME (km.): 284.129 Building: 337

Emission Point: 337A5  
 Height (ft.): 65 Diameter (in.): 25  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 337

**Item 68.13(From Mod 1):**

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

Emission Unit: U-00083

Emission Point: 08116 Removal Date: 05/19/2016  
 Height (ft.): 105 Diameter (in.): 18  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 081

Emission Point: 08130 Removal Date: 05/19/2016  
 Height (ft.): 106 Diameter (in.): 18  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 081

Emission Point: 08132 Removal Date: 05/19/2016  
 Height (ft.): 106 Diameter (in.): 15  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 081

Emission Point: 08133 Removal Date: 05/19/2016  
 Height (ft.): 106 Diameter (in.): 18  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 081

Emission Point: 08134 Removal Date: 05/19/2016

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Height (ft.): 106 Diameter (in.): 14  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 081

Emission Point: 08135 Removal Date: 05/19/2016  
Height (ft.): 106 Diameter (in.): 16  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 081

Emission Point: 08138 Removal Date: 05/19/2016  
Height (ft.): 106 Diameter (in.): 10  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 081

Emission Point: 082X8  
Height (ft.): 110 Diameter (in.): 14  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 082

Emission Point: 205C5  
Height (ft.): 35 Diameter (in.): 28  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 205

**Item 68.14(From Mod 1):**

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

Emission Unit: U-00084

Emission Point: 059K6  
Height (ft.): 137 Length (in.): 16 Width (in.): 12  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 059

Emission Point: 059K7  
Height (ft.): 119 Diameter (in.): 24  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 059

Emission Point: 08212 Removal Date: 10/17/2016  
Height (ft.): 108 Diameter (in.): 106  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 082

Emission Point: 308B5  
Height (ft.): 57 Diameter (in.): 32  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 308

Emission Point: 308B6  
Height (ft.): 57 Diameter (in.): 6  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 308

Emission Point: 308B7  
Height (ft.): 57 Diameter (in.): 22  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 308

Emission Point: 308B8  
Height (ft.): 30 Diameter (in.): 33  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 308



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Emission Point: 308C2  
Height (ft.): 57 Diameter (in.): 27  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 308

Emission Point: 308C3  
Height (ft.): 55 Diameter (in.): 11  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 308

**Item 68.15(From Mod 1):**

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

Emission Unit: U-00085

Emission Point: 059K0  
Height (ft.): 110 Diameter (in.): 10  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 059

Emission Point: 059K1  
Height (ft.): 129 Length (in.): 12 Width (in.): 10  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 059

Emission Point: 059K2  
Height (ft.): 130 Length (in.): 10 Width (in.): 10  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 059

Emission Point: 059K3  
Height (ft.): 119 Diameter (in.): 24  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 059

Emission Point: 059K4  
Height (ft.): 136 Diameter (in.): 16  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 059

Emission Point: 059K5  
Height (ft.): 129 Length (in.): 24 Width (in.): 24  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 059

**Item 68.16(From Mod 1):**

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

Emission Unit: U-00087

Emission Point: 349A5  
Height (ft.): 50 Length (in.): 48 Width (in.): 60  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 349

Emission Point: 349B5  
Height (ft.): 16 Diameter (in.): 8  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 349

Emission Point: 349B6  
Height (ft.): 21 Diameter (in.): 8



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NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349B7  
 Height (ft.): 21                      Diameter (in.): 8  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349B8  
 Height (ft.): 15                      Diameter (in.): 8  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349C2  
 Height (ft.): 30                      Diameter (in.): 14  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349C3  
 Height (ft.): 30                      Diameter (in.): 14  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349C8  
 Height (ft.): 12                      Diameter (in.): 8  
 NYTMN (km.): 4786.321    NYTME (km.): 283.129    Building: 349

Emission Point: 349C9  
 Height (ft.): 12                      Diameter (in.): 8  
 NYTMN (km.): 4786.321    NYTME (km.): 283.129    Building: 349

Emission Point: 349D0  
 Height (ft.): 52                      Diameter (in.): 10  
 NYTMN (km.): 4786.321    NYTME (km.): 283.129    Building: 349

Emission Point: 349D2  
 Height (ft.): 29                      Length (in.): 30                      Width (in.): 20  
 NYTMN (km.): 4786.321    NYTME (km.): 283.129    Building: 349

Emission Point: 349D3  
 Height (ft.): 42                      Diameter (in.): 6  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349D4  
 Height (ft.): 28                      Diameter (in.): 4  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349D5  
 Height (ft.): 37                      Diameter (in.): 10  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349D6  
 Height (ft.): 34                      Diameter (in.): 2  
 NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349D7  
 Height (ft.): 3    Diameter (in.): 2



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NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E0  
Height (ft.): 4    Diameter (in.): 2  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E2  
Height (ft.): 15    Diameter (in.): 6  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E3  
Height (ft.): 15    Diameter (in.): 6  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E4  
Height (ft.): 15    Diameter (in.): 6  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E5  
Height (ft.): 16    Diameter (in.): 8  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E6  
Height (ft.): 16    Diameter (in.): 8  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E7  
Height (ft.): 15    Diameter (in.): 6  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E8  
Height (ft.): 15    Diameter (in.): 6  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349E9  
Height (ft.): 20    Diameter (in.): 6  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349F0  
Height (ft.): 46    Diameter (in.): 4  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349F1  
Height (ft.): 30    Diameter (in.): 4  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349F2  
Height (ft.): 30    Diameter (in.): 4  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: 349

Emission Point: 349F3  
Height (ft.): 20    Diameter (in.): 2

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NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349F5  
Height (ft.): 30 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349F6  
Height (ft.): 37 Diameter (in.): 6  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349F7  
Height (ft.): 45 Diameter (in.): 20  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349F8  
Height (ft.): 38 Diameter (in.): 20  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349F9  
Height (ft.): 2 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349G1  
Height (ft.): 36 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349G3  
Height (ft.): 36 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349G4  
Height (ft.): 36 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349G5  
Height (ft.): 39 Diameter (in.): 12  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349H1  
Height (ft.): 36 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349H2  
Height (ft.): 36 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349H3  
Height (ft.): 36 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349H4  
Height (ft.): 36 Diameter (in.): 8

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NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 349

Emission Point: 349H9  
Height (ft.): 36 Diameter (in.): 16  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349J2  
Height (ft.): 3 Diameter (in.): 3  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349J3  
Height (ft.): 31 Diameter (in.): 18  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349J4  
Height (ft.): 37 Diameter (in.): 10  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349J5  
Height (ft.): 46 Diameter (in.): 21  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

Emission Point: 349J6  
Height (ft.): 4 Diameter (in.): 3  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 349

**Item 68.17(From Mod 1):**

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

Emission Unit: U-00089

Emission Point: 082X6 Removal Date: 08/17/2016  
Height (ft.): 113 Diameter (in.): 19  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 082

**Item 68.18(From Mod 1):**

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

Emission Unit: U-00090

Emission Point: 326C5  
Height (ft.): 64 Diameter (in.): 14  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326C6  
Height (ft.): 64 Diameter (in.): 26  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326C7  
Height (ft.): 87 Diameter (in.): 17  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326



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Emission Point: 326C8  
Height (ft.): 16 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326C9  
Height (ft.): 16 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326D0 Removal Date: 10/17/2016  
Height (ft.): 56 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326D1 Removal Date: 10/17/2016  
Height (ft.): 56 Diameter (in.): 4  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326D2  
Height (ft.): 64 Diameter (in.): 22  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

Emission Point: 326D3 Removal Date: 10/17/2016  
Height (ft.): 64 Diameter (in.): 30  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 326

**Condition 69: Process Definition By Emission Unit  
Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 69.1(From Mod 1):**

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

Emission Unit: U-00009  
Process: H12 Source Classification Code: 3-16-150-03  
Process Description:  
DISTILLING WEST OPERATIONS WITH EMISSION  
CONTROLS TO MEET MACT, RACT AND/OR BACT  
REQUIREMENTS, INCLUDING STORAGE TANKS AND  
DISTILLATION PROCESSES.

Emission Source/Control: 32207 - Control  
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: 32213 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 32214 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 322AA - Process

Emission Source/Control: 322AC - Process

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Emission Source/Control: 322AD - Process

Emission Source/Control: 322AE - Process

Emission Source/Control: 322AF - Process

Emission Source/Control: 322AG - Process

Emission Source/Control: 322AH - Process

Emission Source/Control: 322AI - Process

Emission Source/Control: 322AJ - Process

Emission Source/Control: 322AR - Process

**Item 69.2(From Mod 1):**

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

Emission Unit: U-00012

Process: P03

Source Classification Code: 3-16-160-06

Process Description:

GENERAL PROCESS EMISSION SOURCES, WITH  
PARTICULATE EMISSIONS (REQUIRING CONTROL)

Emission Source/Control: 03007 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03008 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03011 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03012 - Control

Control Type: VAPOR RECOVERY SYS(INCL.

CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: 03017 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 03029 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03033 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03034 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03037 - Control

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Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 03060 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 03061 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 03063 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03064 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 03067 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 03068 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 030AC - Process

Emission Source/Control: 030AD - Process

Emission Source/Control: 030AH - Process

Emission Source/Control: 030AM - Process

Emission Source/Control: 030AN - Process

Emission Source/Control: 030AQ - Process

Emission Source/Control: 030AV - Process

**Item 69.3(From Mod 1):**

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

Emission Unit: U-00012

Process: P04

Source Classification Code: 3-16-040-02

Process Description:

GENERAL PROCESS EMISSION SOURCES WITH  
PARTICULATE EMISSIONS (NOT REQUIRING  
CONTROL).

Emission Source/Control: 03005 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 03065 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 030AG - Process

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Emission Source/Control: 030AO - Process

Emission Source/Control: 030AP - Process

Emission Source/Control: 030AS - Process

Emission Source/Control: 030AW - Process

Emission Source/Control: 030AZ - Process

Emission Source/Control: 030BB - Process

Emission Source/Control: 030BL - Process

**Item 69.4(From Mod 1):**

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

Emission Unit: U-00012

Process: P14

Source Classification Code: 3-16-040-02

Process Description:

GENERAL PROCESS EMISSION SOURCES WITH NO  
PARTICULATE EMISSIONS

Emission Source/Control: 030AB - Process

Emission Source/Control: 030AF - Process

Emission Source/Control: 030AJ - Process

Emission Source/Control: 030AU - Process

Emission Source/Control: 030BE - Process

Emission Source/Control: 030BK - Process

Emission Source/Control: 046AA - Process

**Item 69.5(From Mod 1):**

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

Emission Unit: U-00012

Process: P15

Source Classification Code: 3-16-130-01

Process Description: STORAGE VESSELS SUBJECT TO PART 229

Emission Source/Control: 030BJ - Process

**Item 69.6(From Mod 1):**

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

Emission Unit: U-00016

Process: S13

Source Classification Code: 3-16-040-03

Process Description:





GENERAL SIZE REDUCTION AND DISPERSION  
OPERATIONS INCLUDING SOURCES < 3 LB/HR VOC  
ERP (PARTICULATE MILLING AND MIXING).

Emission Source/Control: 082BE - Process

Emission Source/Control: 082BF - Process

Emission Source/Control: 082BG - Process

Emission Source/Control: 082BH - Process

Emission Source/Control: 082BJ - Process

Emission Source/Control: 082BK - Process

**Item 69.7(From Mod 1):**

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

Emission Unit: U-00021

Process: H80

Source Classification Code: 3-16-150-03

Process Description:

DISTILLING EAST OPERATIONS ASSOCIATED WITH  
PROCESSING SOLVENT GENERATED BY FILM  
MANUFACTURING ON-SITE AT EASTMAN BUSINESS  
PARK.

Emission Source/Control: 12001 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 12006 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 14201 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 14202 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 116BA - Process

Emission Source/Control: 116BB - Process

Emission Source/Control: 120BB - Process

Emission Source/Control: 120BC - Process

Emission Source/Control: 120BD - Process

Emission Source/Control: 120BE - Process

Emission Source/Control: 120BF - Process

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Emission Source/Control: 120BG - Process

Emission Source/Control: 120BK - Process

Emission Source/Control: 120BM - Process

Emission Source/Control: 120BN - Process

Emission Source/Control: 120BQ - Process

Emission Source/Control: 120BS - Process

Emission Source/Control: 120BT - Process

Emission Source/Control: 120BV - Process

Emission Source/Control: 142BA - Process

Emission Source/Control: 142BB - Process

Emission Source/Control: 142BC - Process

Emission Source/Control: 142BD - Process

Emission Source/Control: 142BE - Process

Emission Source/Control: 142BF - Process

Emission Source/Control: 142BG - Process

Emission Source/Control: 142BL - Process

**Item 69.8(From Mod 1):**

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

Emission Unit: U-00021

Process: H81

Source Classification Code: 3-16-150-03

Process Description:

DISTILLING EAST OPERATIONS ASSOCIATED WITH  
PROCESSING SOLVENT GENERATED BY SYN CHEM  
OPERATIONS ON-SITE AT EASTMAN BUSINESS PARK  
AND MATERIALS GENERATED OFF-SITE.

Emission Source/Control: 12001 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 12006 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 14201 - Control

Control Type: WET SCRUBBER

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Emission Source/Control: 14202 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 115BA - Process

Emission Source/Control: 116BB - Process

Emission Source/Control: 120BC - Process

Emission Source/Control: 120BH - Process

Emission Source/Control: 120BJ - Process

Emission Source/Control: 120BL - Process

Emission Source/Control: 120BS - Process

Emission Source/Control: 120BT - Process

Emission Source/Control: 120BU - Process

Emission Source/Control: 120BW - Process

Emission Source/Control: 142BB - Process

Emission Source/Control: 142BH - Process

Emission Source/Control: 142BJ - Process

Emission Source/Control: 142BK - Process

**Item 69.9(From Mod 1):**

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

Emission Unit: U-00021

Process: H82

Source Classification Code: 3-16-150-03

Process Description:

WASTE SOLVENT TANKS ASSOCIATED WITH  
DISTILLING EAST OPERATIONS

Emission Source/Control: 120BP - Process

Emission Source/Control: 120BY - Process

**Item 69.10(From Mod 1):**

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

Emission Unit: U-00023

Process: H06

Source Classification Code: 3-16-160-02

Process Description:

PARTICLE MILLING - RAW MATERIALS HANDLING,



MILLING, AND MIXING OPERATIONS

Emission Source/Control: 08203 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 11201 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 11203 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 11204 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 082BN - Process

Emission Source/Control: 082BO - Process

Emission Source/Control: 112AA - Process

Emission Source/Control: 112AC - Process

**Item 69.11(From Mod 1):**

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

Emission Unit: U-00023  
Process: H07 Source Classification Code: 3-16-040-03  
Process Description:  
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 Source/Control: 103AB - Process

**Item 69.12(From Mod 1):**

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

Emission Unit: U-00024  
Process: E52 Source Classification Code: 3-16-030-02  
Process Description:  
FILM BASE MANUFACTURING PROCESS EMISSIONS  
WHICH ARE SUBJECT TO PART 212 ONLY.

Emission Source/Control: 31745 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 31764 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 31765 - Control

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Control Type: FABRIC FILTER

Emission Source/Control: 31767 - Control      Removal Date: 04/12/2016  
Control Type: FABRIC FILTER

Emission Source/Control: 31768 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 31769 - Control      Removal Date: 04/12/2016  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 31771 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 31773 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 31776 - Control      Removal Date: 04/12/2016  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 31778 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 31780 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 31783 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 31790 - Control      Removal Date: 04/12/2016  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 31791 - Control  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 31792 - Control  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 31793 - Control  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 31794 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 317CB - Process      Removal Date: 04/12/2016

Emission Source/Control: 317CD - Process      Removal Date: 09/09/2015

Emission Source/Control: 317CE - Process      Removal Date: 09/09/2015

Emission Source/Control: 317CH - Process      Removal Date: 04/12/2016



Emission Source/Control: 317CI - Process  
Emission Source/Control: 317CR - Process  
Emission Source/Control: 317CT - Process  
Emission Source/Control: 317DL - Process  
Emission Source/Control: 317DQ - Process  
Emission Source/Control: 317DZ - Process  
Emission Source/Control: 317EB - Process  
Emission Source/Control: 317EC - Process  
Emission Source/Control: 317ED - Process  
Emission Source/Control: 317EG - Process  
Emission Source/Control: 317GF - Process Removal Date: 04/12/2016  
Emission Source/Control: 317GH - Process Removal Date: 09/09/2015  
Emission Source/Control: 317GK - Process  
Emission Source/Control: 317GM - Process  
Emission Source/Control: 317GN - Process  
Emission Source/Control: 317GQ - Process Removal Date: 09/09/2015  
Emission Source/Control: 317GR - Process  
Emission Source/Control: 317GS - Process  
Emission Source/Control: 317GT - Process  
Emission Source/Control: 317GU - Process  
Emission Source/Control: 317GW - Process Removal Date: 04/12/2016  
Emission Source/Control: 317GX - Process  
Emission Source/Control: 317GY - Process Removal Date: 04/12/2016  
Emission Source/Control: 317HA - Process Removal Date: 09/09/2015  
Emission Source/Control: 317HC - Process  
Emission Source/Control: 317HF - Process Removal Date: 04/12/2016



Emission Source/Control: 317HH - Process Removal Date: 09/09/2015  
Emission Source/Control: 317HK - Process  
Emission Source/Control: 317HU - Process  
Emission Source/Control: 317JC - Process  
Emission Source/Control: 317JD - Process  
Emission Source/Control: 335AA - Process Removal Date: 09/09/2015

**Item 69.13(From Mod 1):**

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

Emission Unit: U-00024  
Process: E53 Source Classification Code: 3-16-160-03  
Process Description:  
GENERAL PROCESS EMISSION SOURCES WITHOUT  
PARTICULATE EMISSIONS (I.E. MIXING,  
CHEMICAL STORAGE & CLEANING)

Emission Source/Control: 317AA - Process  
Emission Source/Control: 317AB - Process  
Emission Source/Control: 317AC - Process  
Emission Source/Control: 317CF - Process  
Emission Source/Control: 317DH - Process  
Emission Source/Control: 317DN - Process  
Emission Source/Control: 317EI - Process  
Emission Source/Control: 317EJ - Process Removal Date: 12/22/2015

**Item 69.14(From Mod 1):**

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

Emission Unit: U-00024  
Process: E55 Source Classification Code: 3-16-030-01  
Process Description:  
FILM BASE EXTRUDING AND COATING OPERATIONS  
USING PART 228-1 COMPLIANT COATINGS

Emission Source/Control: 317XA - Process Removal Date: 04/12/2016  
Emission Source/Control: 317XC - Process Removal Date: 09/09/2015  
Emission Source/Control: 317XE - Process



Emission Source/Control: 317XG - Process

**Item 69.15(From Mod 1):**

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

Emission Unit: U-00024  
Process: E56 Source Classification Code: 3-16-030-01  
Process Description:  
RESEARCH AND DEVELOPMENT EXTRUSION AND  
SURFACE COATING OPERATIONS EXEMPT FROM  
6NYCRR PART 228-1.

Emission Source/Control: 317XA - Process Removal Date: 04/12/2016

Emission Source/Control: 317XC - Process Removal Date: 09/09/2015

Emission Source/Control: 317XE - Process

Emission Source/Control: 317XG - Process

**Item 69.16(From Mod 1):**

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

Emission Unit: U-00024  
Process: E63 Source Classification Code: 3-16-160-02  
Process Description:  
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 Source/Control: 351AE - Process

Emission Source/Control: 351AP - Process

**Item 69.17(From Mod 1):**

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

Emission Unit: U-00025  
Process: S05 Source Classification Code: 3-16-120-01  
Process Description: CHEMICAL MANUFACTURING <3.0 LB/HR VOC ERP

Emission Source/Control: 305AA - Process

Emission Source/Control: 305AB - Process

Emission Source/Control: 305AC - Process

**Item 69.18(From Mod 1):**

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





Emission Unit: U-00032  
Process: P93 Source Classification Code: 3-16-030-02  
Process Description:  
GENERAL PROCESS EMISSION SOURCES WITH  
PARTICULATE EMISSIONS (NOT REQUIRING  
CONTROL)

Emission Source/Control: 32612 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 32613 - Control Removal Date: 01/21/2016  
Control Type: FABRIC FILTER

Emission Source/Control: 32616 - Control  
Control Type: DYNAMIC SEPARATOR (DRY)

Emission Source/Control: 32617 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 32618 - Control Removal Date: 01/21/2016  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 32619 - Control  
Control Type: DYNAMIC SEPARATOR (DRY)

Emission Source/Control: 32620 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 326AD - Process

Emission Source/Control: 326AE - Process

Emission Source/Control: 326AF - Process Removal Date: 01/21/2016

Emission Source/Control: 326BC - Process

Emission Source/Control: 326BE - Process

Emission Source/Control: 326BG - Process

Emission Source/Control: 326BH - Process

**Item 69.19(From Mod 1):**

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

Emission Unit: U-00032  
Process: P97 Source Classification Code: 3-16-030-02  
Process Description:  
GENERAL PROCESS EMISSION SOURCES WITH NO  
PARTICULATE EMISSIONS

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Emission Source/Control: 326BA - Process

Emission Source/Control: 326BJ - Process

**Item 69.20(From Mod 1):**

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

Emission Unit: U-00047

Process: P61

Source Classification Code: 3-16-050-01

Process Description:

PLASTIC/PAPER WEB COATING USING PART  
228-1 COMPLIANT COATING SYSTEM

Emission Source/Control: 038AI - Process

**Item 69.21(From Mod 1):**

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

Emission Unit: U-00047

Process: P65

Source Classification Code: 3-16-050-02

Process Description:

GENERAL PROCESS EMISSION SOURCES WITH NO  
PARTICULATE EMISSIONS

Emission Source/Control: 038AA - Process

Emission Source/Control: 038AB - Process

Emission Source/Control: 038AC - Process

Emission Source/Control: 038AD - Process

Emission Source/Control: 038AF - Process

Emission Source/Control: 038AG - Process

Emission Source/Control: 038AH - Process

**Item 69.22(From Mod 1):**

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

Emission Unit: U-00053

Process: I35

Source Classification Code: 3-16-040-01

Process Description:

BATCH SYNTHETIC CHEMICAL MANUFACTURING  
OPERATIONS SUBJECT TO BUILDING 325 VOC  
(VOLATILE ORGANIC COMPOUND) RACT  
(REASONABLY AVAILABLE CONTROL TECHNOLOGY)  
CAP.

Emission Source/Control: 32502 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

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Emission Source/Control: 32503 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 32510 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 32511 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 32512 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 32513 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 32514 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 32515 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 32516 - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 325AM - Process

Emission Source/Control: 325AP - Process

Emission Source/Control: 325AS - Process

Emission Source/Control: 325AT - Process

Emission Source/Control: 325AU - Process

**Item 69.23(From Mod 1):**

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

Emission Unit: U-00053

Process: I47

Source Classification Code: 3-16-130-02

Process Description:

B-325 GLYCOL STORAGE TANKS WITH VOLATILE  
ORGANIC COMPOUND (VOC) EMISSION RATE  
POTENTIAL (ERP) LESS THAN 3 LBS PER HOUR  
(LB/HR)

Emission Source/Control: 325AR - Process

**Item 69.24(From Mod 1):**

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

Emission Unit: U-00056



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Emission Source/Control: 303AM - Process

Emission Source/Control: 303AN - Process

**Item 69.28(From Mod 1):**

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

Emission Unit: U-00060

Process: I25

Source Classification Code: 3-16-040-03

Process Description: BUILDING 301 CHEMICAL BLENDING OPERATIONS

Emission Source/Control: 30102 - Control

Control Type: DUST SUPPRESSION BY WATER SPRAY

Emission Source/Control: 301AA - Process

**Item 69.29(From Mod 1):**

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

Emission Unit: U-00060

Process: I26

Source Classification Code: 3-16-040-01

Process Description:

BUILDING 303 PILOT AREA, WITH FEDERALLY  
ENFORCEABLE VOC CAPS

Emission Source/Control: 30304 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 303AE - Process

Emission Source/Control: 303AP - Process

**Item 69.30(From Mod 1):**

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

Emission Unit: U-00060

Process: I27

Source Classification Code: 3-16-040-03

Process Description:

BUILDING 304 SYNTHETIC CHEMICAL SEPARATING  
AND BLENDING OPERATIONS

Emission Source/Control: 30404 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 30405 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 30406 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 30407 - Control

Control Type: FABRIC FILTER

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Emission Source/Control: 304AA - Process

Emission Source/Control: 304AB - Process

**Item 69.31(From Mod 1):**

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

Emission Unit: U-00060

Process: I28

Source Classification Code: 3-16-040-01

Process Description:

BUILDING 304 BATCH SYNTHETIC CHEMICAL  
MANUFACTURING OPERATIONS

Emission Source/Control: 30412 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 30413 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 30414 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 30415 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 30416 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 304AE - Process

Emission Source/Control: 304AF - Process

Emission Source/Control: 304AJ - Process

Emission Source/Control: 304AK - Process

**Item 69.32(From Mod 1):**

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

Emission Unit: U-00060

Process: I45

Source Classification Code: 3-16-040-01

Process Description:

BUILDING 304 HARDENER MANUFACTURING  
OPERATIONS SUBJECT TO FEDERALLY ENFORCEABLE  
CAPS FOR VOCS AND PARTICULATES

Emission Source/Control: 30410 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 30411 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)



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

Emission Unit: U-00060  
Process: I52                                      Source Classification Code: 3-16-040-03  
Process Description:  
BUILDING 337 BATCH SMALL SCALE  
MISCELLANEOUS COATING MANUFACTURING  
OPERATIONS SUBJECT TO 40 CFR 63 SUBPART  
HHHHH, WITH SOLID PARTICULATE EMISSIONS.

Emission Source/Control: 337AA - Process

**Item 69.36(From Mod 1):**

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

Emission Unit: U-00083  
Process: Y10                                      Source Classification Code: 3-16-160-03  
Process End Date: 5/19/2016  
Process Description:  
BUILDING 81 MICRO-ELECTRO-MECHANICAL  
SYSTEMS (MEMS) MANUFACTURING & ASSEMBLY,  
RELATED R&D ACTIVITIES AND ASSOCIATED  
FUGITIVE EMISSIONS

Emission Source/Control: 08136 - Control      Removal Date: 05/19/2016  
Control Type: THERMAL OXIDATION

Emission Source/Control: 08137 - Control      Removal Date: 05/19/2016  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 081BA - Process      Removal Date: 05/19/2016

Emission Source/Control: 081BB - Process      Removal Date: 05/19/2016

Emission Source/Control: 081BD - Process      Removal Date: 05/19/2016

Emission Source/Control: 081BE - Process      Removal Date: 05/19/2016

Emission Source/Control: 081BF - Process      Removal Date: 05/19/2016

Emission Source/Control: 081BG - Process      Removal Date: 05/19/2016

Emission Source/Control: 081BJ - Process      Removal Date: 05/19/2016

**Item 69.37(From Mod 1):**

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

Emission Unit: U-00083  
Process: Y14                                      Source Classification Code: 3-16-160-03  
Process Description:  
BUILDING 82 & 205 ELECTRO PHOTOGRAPHIC  
MATERIALS MANUFACTURING, RELATED R&D



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ACTIVITIES AND ASSOCIATED FUGITIVE EMISSIONS.

Emission Source/Control: 20514 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 082BM - Process

Emission Source/Control: 205CX - Process

**Item 69.38(From Mod 1):**

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

Emission Unit: U-00084

Process: G01

Source Classification Code: 3-16-050-01

Process Description:

WEB FORMATION OR COATING OF PLASTIC/PAPER FOR R&D ONLY, EXEMPT FROM THE REQUIREMENTS OF 6 NYCRR PART 228-1. EMISSION SOURCES 082AJ AND 308AA ARE SUBJECT TO NSR RECORD KEEPING / CAPS FOR VOCS.

Emission Source/Control: 059BB - Process

Emission Source/Control: 059BE - Process

Emission Source/Control: 082AJ - Process      Removal Date: 10/17/2016

Emission Source/Control: 308AA - Process

Emission Source/Control: 308AY - Process

Emission Source/Control: 308BB - Process

**Item 69.39(From Mod 1):**

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

Emission Unit: U-00084

Process: G02

Source Classification Code: 3-16-050-03

Process Description: NATURAL GAS-FIRED DRYER SUBJECT TO PART 227.

Emission Source/Control: 308AB - Process

**Item 69.40(From Mod 1):**

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

Emission Unit: U-00084

Process: G05

Source Classification Code: 3-16-160-03

Process Description:

GENERAL PROCESS EMISSION SOURCES SUBJECT TO NSR RECORD KEEPING AND CAP FOR VOCS.

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Emission Source/Control: 308AF - Process

Emission Source/Control: 308AG - Process

Emission Source/Control: 308AJ - Process

Emission Source/Control: 308AK - Process

Emission Source/Control: 308AL - Process

Emission Source/Control: 308AM - Process

Emission Source/Control: 308AN - Process

Emission Source/Control: 308AQ - Process

Emission Source/Control: 308AU - Process

Emission Source/Control: 308AZ - Process

Emission Source/Control: 308BA - Process

**Item 69.41(From Mod 1):**

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

Emission Unit: U-00084

Process: G06

Source Classification Code: 3-01-018-63

Process Description:

GENERAL PROCESS EMISSION SOURCES WITH (1) VOC/NO<sub>x</sub> EMISSIONS LESS THAN RACT THRESHOLDS OF 3.0 LB/HR ERP AND (2) NO<sub>x</sub> EMISSIONS LESS THAN 15 LB/DAY (FOR NO<sub>x</sub> SOURCES CONSTRUCTED AFTER 8/15/94).

Emission Source/Control: 059BA - Process

Emission Source/Control: 059BC - Process

Emission Source/Control: 059BD - Process

Emission Source/Control: 308AC - Process

Emission Source/Control: 308AX - Process

Emission Source/Control: 308BC - Process

Emission Source/Control: 308BD - Process

**Item 69.42(From Mod 1):**

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

Emission Unit: U-00084

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Process: G07 Source Classification Code: 3-01-018-63

Process Description:  
COMMERCIAL EXTRUSION / CASTING OF FILM  
WEB, SUBJECT TO PART 212 ONLY

Emission Source/Control: 308AY - Process

Emission Source/Control: 308BB - Process

**Item 69.43(From Mod 1):**

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

Emission Unit: U-00084

Process: G08 Source Classification Code: 3-01-018-63

Process Description:  
COMMERCIAL COATING OF FILM BASE OR PAPER,  
USING PART 228-1 COMPLIANT COATINGS.

Emission Source/Control: 059BB - Process

Emission Source/Control: 059BE - Process

Emission Source/Control: 308AA - Process

Emission Source/Control: 308AY - Process

Emission Source/Control: 308BB - Process

**Item 69.44(From Mod 1):**

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

Emission Unit: U-00084

Process: G09 Source Classification Code: 3-16-050-01

Process Description:  
COMMERCIAL COATING OF FILM BASE OR PAPER,  
UTILIZING LOW VOLUME EXEMPTION OF 6NYCRR  
228-1.1(e)(13). EXEMPT FROM 6NYCRR PART  
212 PER 6NYCRR 212.7(I), AND EXEMPT  
ACTIVITY PER 6NYCRR 201-3.2(c)(31).

Emission Source/Control: 059BB - Process

Emission Source/Control: 059BE - Process

**Item 69.45(From Mod 1):**

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

Emission Unit: U-00084

Process: G10 Source Classification Code: 3-01-018-63

Process Description:  
COMMERCIAL COATING OF FILM BASE OR PAPER,  
USING PART 228-1 NON-COMPLIANT COATING

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SOLUTIONS, SUBJECT TO A PART 228 VOC RACT  
CAP.

Emission Source/Control: 308AA - Process

**Item 69.46(From Mod 1):**

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

Emission Unit: U-00085

Process: S15

Source Classification Code: 3-16-050-01

Process Description:

R&D COATING OF PLASTIC/ PAPER (EXEMPT FROM  
THE REQUIREMENTS OF PART 228-1).

Emission Source/Control: 059AX - Process

Emission Source/Control: 059AY - Process

**Item 69.47(From Mod 1):**

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

Emission Unit: U-00085

Process: S21

Source Classification Code: 3-16-050-01

Process Description:

COMMERCIAL COATING OF PLASTIC / PAPER  
USING PART 228-1 COMPLIANT COATINGS

Emission Source/Control: 059AX - Process

Emission Source/Control: 059AY - Process

**Item 69.48(From Mod 1):**

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

Emission Unit: U-00085

Process: S23

Source Classification Code: 3-16-160-03

Process Description:

GENERAL PROCESS EMISSION SOURCES USED FOR  
COMMERCIAL PRODUCTION (E.G. CHEMICAL  
WEIGHING, MELTING & SPLICING).

Emission Source/Control: 059AN - Process

Emission Source/Control: 059AT - Process

Emission Source/Control: 059AU - Process

Emission Source/Control: 059AV - Process

Emission Source/Control: 059AW - Process

Emission Source/Control: 059AZ - Process



**Item 69.49(From Mod 1):**

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

Emission Unit: U-00085  
Process: S29 Source Classification Code: 3-16-050-01  
Process Description:  
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 Source/Control: 059AX - Process

Emission Source/Control: 059AY - Process

**Item 69.50(From Mod 1):**

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

Emission Unit: U-00087  
Process: N10 Source Classification Code: 3-15-010-02  
Process Description:  
TONER MANUFACTURING GENERAL PROCESS  
EMISSION SOURCES WITH VOC AND/OR NOX  
EMISSIONS LESS THAN RACT THRESHOLD OF 3.0  
LBS/HR.

Emission Source/Control: 34907 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34908 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: 34916 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34919 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 34920 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34921 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34925 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34926 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34927 - Control

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Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34928 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34930 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34949 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 34966 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34967 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34968 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34969 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 34970 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 34971 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 34972 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34973 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34974 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34975 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34976 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 34978 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 34980 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34981 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

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Emission Source/Control: 34983 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34994 - Control  
Control Type: PAPER FILTER

Emission Source/Control: 34995 - Control  
Control Type: PAPER FILTER

Emission Source/Control: 34996 - Control  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 34997 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 34998 - Control  
Control Type: PAPER FILTER

Emission Source/Control: 34999 - Control  
Control Type: PAPER FILTER

Emission Source/Control: 349AJ - Process

Emission Source/Control: 349AT - Process

Emission Source/Control: 349BG - Process

Emission Source/Control: 349BH - Process

Emission Source/Control: 349BJ - Process

Emission Source/Control: 349BK - Process

Emission Source/Control: 349BL - Process

Emission Source/Control: 349BM - Process

Emission Source/Control: 349BN - Process

Emission Source/Control: 349BP - Process

Emission Source/Control: 349BQ - Process

Emission Source/Control: 349BR - Process

Emission Source/Control: 349BS - Process

Emission Source/Control: 349BT - Process

Emission Source/Control: 349BU - Process

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- Emission Source/Control: 349BV - Process
- Emission Source/Control: 349BW - Process
- Emission Source/Control: 349BX - Process
- Emission Source/Control: 349BY - Process
- Emission Source/Control: 349BZ - Process
- Emission Source/Control: 349CA - Process
- Emission Source/Control: 349CB - Process
- Emission Source/Control: 349CC - Process
- Emission Source/Control: 349CD - Process
- Emission Source/Control: 349CE - Process
- Emission Source/Control: 349CF - Process
- Emission Source/Control: 349CG - Process
- Emission Source/Control: 349CJ - Process
- Emission Source/Control: 349CK - Process
- Emission Source/Control: 349CM - Process
- Emission Source/Control: 349CN - Process
- Emission Source/Control: 349CQ - Process
- Emission Source/Control: 349EM - Process
- Emission Source/Control: 349EP - Process
- Emission Source/Control: 349ER - Process
- Emission Source/Control: 349ES - Process
- Emission Source/Control: 349ET - Process
- Emission Source/Control: 349EU - Process
- Emission Source/Control: 349EW - Process
- Emission Source/Control: 349EX - Process
- Emission Source/Control: 349EY - Process



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**Item 69.51(From Mod 1):**

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

Emission Unit: U-00087  
Process: N40                                      Source Classification Code: 3-15-010-02  
Process Description: ROOM 113 SOLVENT RECYCLE AND STORAGE TANK(S)

Emission Source/Control: 349DA - Process

**Item 69.52(From Mod 1):**

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

Emission Unit: U-00087  
Process: N41                                      Source Classification Code: 3-15-010-02  
Process Description:  
ROOM 113 TONER MANUFACTURING OPERATIONS  
WITH VOC EMISSIONS LESS THAN RACT THRESHOLD  
OF 3.0 LB/HR

Emission Source/Control: 34977 - Control  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 349DC - Process

Emission Source/Control: 349DD - Process

Emission Source/Control: 349DE - Process

**Item 69.53(From Mod 1):**

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

Emission Unit: U-00087  
Process: N42                                      Source Classification Code: 3-15-010-02  
Process Description:  
ROOM 116/132/137 TONER MANUFACTURING  
OPERATIONS WITH VOC EMISSIONS LESS THAN  
RACT THRESHOLD OF 3.0 LB/HR

Emission Source/Control: 349EA - Process

**Item 69.54(From Mod 1):**

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

Emission Unit: U-00087  
Process: N43                                      Source Classification Code: 3-15-010-02  
Process Description:  
ROOM 116/132/137 TONER MANUFACTURING  
OPERATIONS - SOLVENT AND WASTE STORAGE  
TANK(S)

Emission Source/Control: 34986 - Control  
Control Type: CONSERVATION VENT

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Emission Source/Control: 34987 - Control  
Control Type: CONSERVATION VENT

Emission Source/Control: 349EE - Process

Emission Source/Control: 349EF - Process

**Item 69.55(From Mod 1):**

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

Emission Unit: U-00087

Process: N44

Source Classification Code: 3-15-010-02

Process Description:

ROOM 116/132/137 TONER MANUFACTURING  
OPERATIONS WITH VOC EMISSION LESS THAN 3.0  
LB/HR AND PARTICULATE EMISSIONS

Emission Source/Control: 34988 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 34993 - Control

Control Type: DYNAMIC SEPARATOR (WET)

Emission Source/Control: 349EG - Process

Emission Source/Control: 349EL - Process

**Item 69.56(From Mod 1):**

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

Emission Unit: U-00089

Process: S11

Source Classification Code: 3-16-040-03

Process End Date: 8/17/2016

Process Description:

SMALL SCALE CHEMICAL MANUFACTURING AND  
DISPERSION OPERATIONS INCLUDING SOURCES  
<3.0 LB/HR VOC ERP

Emission Source/Control: 082CA - Process

Removal Date: 08/17/2016

**Item 69.57(From Mod 1):**

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

Emission Unit: U-00090

Process: Z01

Source Classification Code: 3-16-060-01

Process Description: GENERAL PROCESS EMISSION SOURCES

Emission Source/Control: 32621 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 32622 - Control



Control Type: WET SCRUBBER

Emission Source/Control: 326BK - Process

Emission Source/Control: 326BL - Process

Emission Source/Control: 326BP - Process

Emission Source/Control: 326BQ - Process

Emission Source/Control: 326BR - Process

Emission Source/Control: 326BT - Process Removal Date: 10/17/2016

Emission Source/Control: 326BU - Process Removal Date: 10/17/2016

Emission Source/Control: 326BV - Process

Emission Source/Control: 326BW - Process

Emission Source/Control: 326BX - Process Removal Date: 10/17/2016

Emission Source/Control: 326BY - Process

**Item 69.58(From Mod 1):**

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

Emission Unit: U-00090

Process: Z02

Source Classification Code: 4-05-003-01

Process Description:

FLEXOGRAPHIC PRINTING OPERATIONS SUBJECT  
TO PART 234

Emission Source/Control: 326BN - Process

**Item 69.59(From Mod 1):**

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

Emission Unit: U-00090

Process: Z03

Source Classification Code: 4-05-003-01

Process Description: STORAGE VESSELS SUBJECT TO PART 229

Emission Source/Control: 326BS - Process

**Item 69.60(From Mod 0):**

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

Emission Unit: F-AC001

Process: 226

Source Classification Code: 4-01-003-36

Process Description:

SOLVENT METAL CLEANING MACHINES OPERATED  
BY KODAK LOCATED THROUGHOUT EASTMAN

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BUSINESS PARK WITH 6 NYCRR PART 226  
APPLICABILITY WHICH WOULD OTHERWISE BE  
EXEMPT OR TRIVIAL CONSISTENT WITH PART  
201-3.

Emission Source/Control: F0226 - Process

**Item 69.61(From Mod 0):**

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

Emission Unit: F-AC003

Process: SIL

Source Classification Code: 2-01-002-02

Process Description:

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.

Emission Source/Control: SILBH - Combustion

**Item 69.62(From Mod 0):**

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

Emission Unit: F-AC004

Process: AD1

Source Classification Code: 3-16-160-03

Process Description:

MISCELLANEOUS OPERATIONS LOCATED  
THROUGHOUT EASTMAN BUSINESS PARK USING  
ADHESIVES, SEALANTS, ADHESIVE PRIMERS &  
SEALANT PRIMERS, SUBJECT TO PART 228-2

Emission Source/Control: AD001 - Process

**Item 69.63(From Mod 0):**

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

Emission Unit: F-AC004

Process: AD2

Source Classification Code: 3-16-160-03

Process Description:

MISCELLANEOUS OPERATIONS LOCATED  
THROUGHOUT EASTMAN BUSINESS PARK USING  
ADHESIVES, SEALANTS, ADHESIVE PRIMERS &  
SEALANT PRIMERS, WITH FACILITY EMISSIONS  
ELIGIBLE FOR LOW-USE EXEMPTION

Emission Source/Control: AD001 - Process

**Item 69.64(From Mod 0):**

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

Emission Unit: F-AC004



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Process: AD3

Source Classification Code: 3-16-160-03

Process Description:

MISCELLANEOUS OPERATIONS LOCATED  
THROUGHOUT EASTMAN BUSINESS PARK USING  
ADHESIVES, SEALANTS, ADHESIVE PRIMERS &  
SEALANT PRIMERS, FOR RESEARCH AND  
DEVELOPMENT

Emission Source/Control: AD002 - Process

**Item 69.65(From Mod 0):**

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

Emission Unit: U-00075

Process: S10

Source Classification Code: 3-16-040-02

Process Description:

GENERAL PROCESS EMISSION SOURCES WITH VOC  
EMISSION RATE POTENTIAL < 3.0 LB/HR (ie.  
SOLDERING OPERATIONS).

Emission Source/Control: 082AS - Process

**Condition 70: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

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

**Item 70.1:**

The Compliance Certification activity will be performed for:

Emission Unit: F-AC001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 70.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for Cold Cleaning Degreasers

**A. Equipment Specifications**

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

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if  
practical. When cleaning a part that isn't practical to  
drain under cover, the part shall be drained in a way  
which minimizes emissions of VOC.



(3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.

(4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

**B. Operating Requirements:**

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

**C. General Requirements:**

A Person conducting solvent metal cleaning must:

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

(2) Maintain equipment to minimize leaks and fugitive emissions.

(3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.

(4) Keep the degreaser cover closed except when:

(a) parts are being placed into or being removed from the degreaser;

(b) adding or removing solvent from the degreaser;

(c) no solvent is in the degreaser; or

(d) when manually cleaning metal parts in the cold cleaning degreaser.

(5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.

(6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.

(7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.

(a) the name and address of the solvent supplier;

(b) the type of solvent including the product or vendor identification number; and

(c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

**D. Record Keeping Requirements:**

Deviations from these requirements shall be recorded in a

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log maintained for this purpose within the corresponding operating area and shall be appropriately identified in the semi-annual monitoring report. In addition, the log must note whether the cold cleaner is equipped with an internal drain as specified in item A(2) above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 73: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.6665, Subpart ZZZZ**

**Item 73.1:**

The Compliance Certification activity will be performed for:

Emission Unit: F-AC003

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 73.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of affected sources subject to 40CFR63 Subpart ZZZZ must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 8 of Subpart ZZZZ. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

The owner or operator of an applicable source using a control device to comply with the emission standard shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 83: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 227-1.3 (a)**

**Item 83.1:**

The Compliance Certification activity will be performed for:

Emission Unit: F-AC003

Process: SIL

**Item 83.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except that for one six-minute block period per hour of not more than 27 percent opacity. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. The stationary RICE units subject to this condition shall be fired only with natural gas.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 84: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.6602, Subpart ZZZZ**

**Item 84.1:**



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The Compliance Certification activity will be performed for:

Emission Unit: F-AC003

Process: SIL

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 84.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Beginning on October 19, 2013 for each stationary RICE unit in Process SIL, Kodak shall meet the following requirements in accordance with Table 2c of Subpart ZZZZ:

- 1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- 2) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and
- 3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Kodak has the option to utilize an oil analysis program as described in §63.6625(j) in order to extend the specified oil change requirement.

Kodak shall maintain the records of the maintenance activities and inspections described above on site and shall make them available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 85: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.6625(e), Subpart ZZZZ**

**Item 85.1:**

The Compliance Certification activity will be performed for:



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Process: SIL

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 85.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Beginning on October 19, 2013 for each stationary RICE unit in Process SIL, Kodak 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 its 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.

Kodak shall maintain the records of the maintenance activities described above on site and shall make them available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 86: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.6625(f), Subpart ZZZZ**

**Item 86.1:**

The Compliance Certification activity will be performed for:

Emission Unit: F-AC003

Process: SIL

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 86.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Prior to October 19, 2013, Kodak must install a



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non-resettable hour meter on each stationary RICE unit in Process SIL if one is not already installed.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 87: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.6625(h), Subpart ZZZZ**

**Item 87.1:**

The Compliance Certification activity will be performed for:

Emission Unit: F-AC003

Process: SIL

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 87.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Beginning on October 19, 2013 for each stationary RICE unit in ProcessSIL, Kodak must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 88: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.6640(f)(1), Subpart ZZZZ**

**Item 88.1:**

The Compliance Certification activity will be performed for:

Emission Unit: F-AC003

Process: SIL

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Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 88.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Beginning on October 19, 2013, Kodak must operate each stationary RICE unit in Process SIL, in accordance with paragraph 63.6640(f)(1) as follows:

- i) There is no time limit on the use of emergency stationary RICE in emergency situations.
  
- ii) Kodak may operate each emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. Kodak may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if Kodak maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
  
- iii) Kodak may operate each emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response



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operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this condition, as long as the power provided by the financial arrangement is limited to emergency power.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 89: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.6655(f), Subpart ZZZZ**

**Item 89.1:**

The Compliance Certification activity will be performed for:

Emission Unit: F-AC003

Process: SIL

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 89.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Beginning on October 19, 2013 for each stationary RICE unit in Process SIL, Kodak must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Kodak must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, Kodak must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

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**Condition 166: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63, Subpart FFFF**

**Item 166.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

CAS No: 0NY998-00-0 VOC

**Item 166.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission sources in Process H12 associated with Kodak's Bldg 322 Distillation operations are subject to the control requirements of the MON MACT according to 40 CFR 63.2455 (continuous process vents), 63.2460 (batch process vents), and 63.2470 (storage tanks). In order to comply with these requirements, the scrubbers (Control Devices 32213 and 32214) and the refrigerated vent condenser (Control Device 32207) shall be maintained and operated to provide an overall removal efficiency of HAPs of at least 95%.

Additionally, these sources are subject to 6 NYCRR Part 212.10 VOC RACT (Volatile Organic Compounds) (Reasonably Available Control Technology) requiring an overall removal efficiency of VOCs of at least 81%, and 40 CFR 64 CAM (Compliance Assurance Monitoring).

In order to demonstrate compliance with these requirements, Kodak shall maintain liquid to vapor ratios (L/V) for the scrubbers as given below:

- a) the liquid/vapor controller on the methanol scrubber shall be maintained at or above 1.6 (fresh methanol kg/hr / vapor flow rate acfm); and
- b) the liquid/vapor controller on the water scrubber shall be maintained at or above 5.2 (fresh water kg/hr / vapor flow rate acfm).

The L/V ratios shall be recorded a minimum of once per shift while the process is in operation. The flow monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and established operating procedures. Records shall be kept on site for 5 years and made available to the Department

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upon request.

Monitoring Frequency: PER SHIFT  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 167: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63, Subpart FFFF**

**Item 167.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP  
CAS No: 0NY998-00-0 VOC

**Item 167.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission sources in Process H12 associated with Kodak's Bldg 322 Distillation operations are subject to the control requirements of the MON MACT according to 40 CFR 63.2455 (continuous process vents), 63.2460 (batch process vents), and 63.2470 (storage tanks). In order to comply with these requirements, the scrubbers (Control Devices 32213 and 32214) and the refrigerated vent condenser (Control Device 32207) shall be maintained and operated to provide an overall removal efficiency of HAPs of at least 95%.

Additionally, these sources are subject to 6 NYCRR Part 212.10 VOC RACT (Volatile Organic Compounds) (Reasonably Available Control Technology), requiring an overall removal efficiency of VOCs of at least 81%, and 40 CFR 64 CAM (Compliance Assurance Monitoring).

In order to demonstrate compliance with these requirements, Kodak shall maintain the glycol temperature for the refrigerated vent condenser (Control Device 32207) below -10 degrees C. When the ambient temperature is

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above 28 degrees C, the refrigerated vent condenser may operate with an upper temperature limit of -5 degrees C for a maximum of 400 hours per calendar year. Kodak shall maintain a record of the hours operated under this high temperature condition.

The refrigerated vent condenser temperature shall be recorded a minimum of once per shift while the process is in operation. The temperature monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and established operating procedures.

Records shall be kept on site for 5 years and made available to the Department upon request.

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 168: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63, Subpart FFFF**

**Item 168.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

CAS No: 0NY100-00-0 TOTAL HAP

**Item 168.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission sources in Process H12 associated with Kodak's Bldg 322 Distillation operations are subject to the control requirements of the MON MACT according to 40 CFR 63.2455 (continuous process vents), 63.2460 (batch process vents), and 63.2470 (storage tanks). In order to comply with these requirements, the scrubbers (Control Devices 32213 and 32214) and the refrigerated vent



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condenser (Control Device 32207) shall be maintained and operated to provide an overall removal efficiency of HAPs of at least 95%.

Additionally, these sources are subject to 6 NYCRR Part 212.10 VOC RACT (Volatile Organic Compounds) (Reasonably Available Control Technology), requiring an overall removal efficiency of VOCs of at least 81%, and 40 CFR 64 CAM (Compliance Assurance Monitoring).

In order to demonstrate compliance with these requirements, Kodak shall maintain the fluid flow rates for the scrubbers as given below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 1650 kg/hr;
- b) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 50 kg/hr; and
- c) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 165 kg/hr.

The scrubber flow rates shall be recorded a minimum of once per shift while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and established operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Monitoring Frequency: PER SHIFT

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 169: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63.2435(d), Subpart FFFF**

**Item 169.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

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

**Item 169.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

If the predominant use of a transfer rack loading arm or storage tank (including storage tanks in series) is associated with a miscellaneous organic chemical manufacturing process, and the loading arm or storage tank is not part of an affected source under any other MACT rule, then Kodak must assign the loading arm or storage tank to the MCPU for that miscellaneous organic chemical manufacturing process. If the predominant use cannot be determined, then Kodak may assign the loading arm or storage tank to any MCPU that shares it and is subject to the MON MACT. If the use varies from year to year, then Kodak must base the determination on the utilization that occurred during the year preceding November 10, 2003 or, if the loading arm or storage tank was not in operation during that year, Kodak must base the use on the expected use for the first 5-year period after startup. Kodak must include the determination in the notification of compliance status report. Kodak must redetermine the primary use at least once every 5 years, or any time Kodak implements emissions averaging or pollution prevention after May 10, 2008.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-32: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 174**

**Item 1-32.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00009

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

**Item 1-32.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Bypass lines are subject to the inspection and monitoring requirements specified at §63.983(b)(4) of Subpart

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SS.

For each bypass line, if a flow indicator is used, Kodak shall take a reading at least once every 15 minutes or if the bypass line valve is secured in the non-diverting position, Kodak shall visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 170: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 170.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 170.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.998(d)(5) of Subpart SS, Kodak shall record the occurrences and the cause of periods when the monitored parameters are outside of the parameter ranges documented in the Notification of Compliance Status report. This information shall also be reported in the Periodic Report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 171: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 171.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 171.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The closed-vent control system and control devices vented to Emission Point (EP 322B1) are subject to the equipment leak record keeping requirements specified under §63.998(d)(4) of Subpart SS.

Kodak shall maintain records of the following information for closed vent systems and control devices:

- (1) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams; the dates and descriptions of any changes in the design specifications; and a description of the parameter or parameters monitored to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. These records shall be retained for the life of the equipment.
- (2) Dates and durations when the closed vent systems and control devices required are not operated as designed as indicated by the monitored parameters; dates and durations during which the monitoring system or monitoring device is inoperative; and dates and durations of start-ups and shutdowns of required control devices. These records shall be retained for 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 172: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 172.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 172.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to Start-up, Shutdown, and Malfunction Record Keeping requirements specified under §63.998(d)(3) of Subpart SS. Kodak shall maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment used to comply with the MON MACT during which excess emissions occur. For each start-up, shutdown, and malfunction during which excess emissions occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing control device emissions to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 173: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 173.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 173.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Closed-vent control system vented to Emission Point (EP 322B1), is subject to the inspection and monitoring requirements specified under §63.982(c) of Subpart SS.

Except for any closed vent systems that are designated as unsafe or difficult to inspect, each closed vent system shall be inspected, in accordance with the requirements of §63.983(b), as follows:

(1) If the closed vent system is constructed of hard-piping, Kodak shall conduct an initial inspection and conduct annual inspections for visible, audible, or olfactory indications of leaks. If the closed vent system is constructed of ductwork, Kodak shall conduct an initial and annual inspection using Method 21.

(2) Any parts of the closed vent system that are designated as unsafe to inspect are exempt from the inspection requirements if Kodak determines that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying; and Kodak has a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times. Inspection is not required more than once annually.

(3) Any parts of the closed vent system that are designated as difficult-to-inspect are exempt from the inspection requirements if Kodak determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface and Kodak has a written plan that requires inspection of the equipment at least once every 5 years.

Inspection records shall be generated.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 175: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2450(e), Subpart FFFF**

**Item 175.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

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

**Item 175.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Closed Vent System is subject to leak repair requirements specified at §63.983(d) of Subpart SS. If there are visible, audible, or olfactory indications of leaks from closed vent systems at the time of the annual visual inspections, Kodak shall eliminate the leak or monitor the equipment using Method 21. Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired as soon as practical.

A first attempt at repair shall be made no later than 5 days after the leak is detected. Repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later.

Delay of repair of a closed vent system for which leaks have been detected is allowed if repair within 15 days after a leak is detected is technically infeasible or unsafe without a closed vent system shutdown, or if Kodak determines that emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed as soon as practical, but not later than the end of the next closed vent system shutdown.

The following records shall be generated when a leak is detected:

(1) The instrument and the equipment identification number and the operator name, initials, or identification

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number;

- (2) The date the leak was detected and the date of the first attempt to repair the leak;
- (3) The date of successful repair of the leak;
- (4) The maximum instrument reading measured after the leak is successfully repaired or determined to be nonrepairable;
- (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. Kodak may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure; and
- (6) Copies of the Periodic Reports, if records are not maintained on a computerized database capable of generating summary reports from the records.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 176: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2470(d), Subpart FFFF**

**Item 176.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 176.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emission limits in table 4 of subpart FFFF for control devices used to control emissions from storage tanks do not apply during periods of planned routine maintenance.

Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit specified in table 4 of subpart FFFF, must not exceed 240 hours/year.



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The facility may submit an application to NYSDEC requesting an extension of this time limit to a total of 360 hr/yr. The application must explain why the extension is needed, it must indicate that no material will be added to the storage tank between the time the 240 hour limit is exceeded and the control device is again operational, and it must be submitted at least 60 days before the 240 hour limit will be exceeded.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 177: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 177.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 177.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Special provisions for leak detection for agitators equipped with dual mechanical seal systems are specified under §63.1028(e)(1) of Subpart UU.

For Emission Sources 322AJ and 322AR, each agitator shall be equipped with a dual mechanical seal and a barrier fluid system. The barrier fluid shall be maintained at a pressure that is at all times (except during periods of startup, shutdown, or malfunction) greater than the agitator stuffing box pressure.

Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both. Each sensor shall be observed daily or equipped with an alarm.

The owner or operator shall determine, based on design

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considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. If based on the criteria the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected and shall be repaired pursuant to §63.1024, as applicable.

The owner or operator shall keep records of the design criteria and an explanation of the design criteria; and any changes to these criteria and the reasons for the changes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 178: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 178.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 178.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection and Repair (LDAR) Monitoring for pressure relief devices in gas and vapor service shall be conducted in accordance with §63.1030(a) of Subpart UU.

Except during pressure releases, each pressure relief device in gas and vapor service shall be operated with an instrument reading of less than 500 parts per million as measured by Method 21. Unless the delay of repair provisions apply, after each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million, as soon as practical, but no later than 5 calendar days after each pressure release. The pressure relief device shall be monitored no later than five calendar days after the pressure release to confirm the

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condition indicated by an instrument reading of less than 500 parts per million above background, as measured by Method 21.

Kodak shall record the dates and results of the monitoring following a pressure release including the background level measured and the maximum instrument reading measured during the monitoring.

Any pressure relief device that is routed to a process gas system or is equipped with a closed vent system capable of capturing and transporting leakage from the pressure relief device to a control device is exempt from these monitoring requirements.

Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from these monitoring requirements provided that Kodak installs a replacement rupture disk upstream of the pressure relief device as soon as practical after each pressure release but no later than 5 calendar days after each pressure release, unless the delay of repair provisions apply.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 179: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 179.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

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

**Item 179.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak Detection and Repair (LDAR) monitoring for open-ended valves or lines shall be conducted in accordance with §63.1033(a) of Subpart UU.



Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply at all other times.

Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from these requirements.

Open-ended valves or lines containing materials that would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system are also exempt from these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 180: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 180.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 180.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Special provisions for leak detection for difficult-to-monitor agitator seals are specified under §63.1028(e)(5) of Subpart UU.



For any agitator seal that is designated as a difficult-to-monitor agitator seal (Emission Sources 322AJ and 322 AR), Kodak shall monitor the agitator seal according to a written plan that requires monitoring of the equipment at least once per calendar year and repair of the equipment if a leak is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 181: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 181.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 181.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for pumps shall be conducted in accordance with the requirements of §63.1026 of Subpart UU.

(a) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. Kodak shall document that the inspection was conducted and the date of the inspection.

If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, Kodak shall:

(1) Monitor the pump using Method 21. If the instrument reading indicates a leak, a leak is detected and it shall be repaired; or

(2) Kodak shall eliminate the visual indications of liquids dripping.

(b) Since all pumps in Distilling West are part of a

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single MCPU, Kodak shall monitor each pump monthly to detect leaks by Method 21. The instrument reading that defines a leak is:

- (1) 1,000 parts per million or greater for all pumps with single mechanical seals associated with "batch process vents"; and
- (2) 1,000 parts per million or greater for all pumps with single mechanical seals associated with "continuous process vents".

For pumps to which a 1,000 parts per million leak definition applies, repair is not required unless an instrument reading of 2,000 parts per million or greater is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 182: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 182.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 182.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall monitor each valve at the intervals described below to detect leaks by Method 21. The instrument reading that defines a leak is 500 parts per million or greater for all valves in gas and vapor service and in light liquid service.

In accordance with §63.1025(b) of Subpart UU, Kodak shall monitor valves for leaks at the following intervals:

- (1) If at least the greater of 2 valves or 2 percent of

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the valves in a process unit leak Kodak shall monitor each valve once per month.

(2) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, Kodak shall monitor each valve once each quarter. Monitoring data generated before the regulated source became subject to the MON MACT may be used to qualify initially for less frequent monitoring.

(3) At process units with less than 1 percent leaking valves, Kodak may elect to monitor each valve once every two quarters.

(4) At process units with less than 0.5 percent leaking valves, Kodak may elect to monitor each valve once every four quarters.

(5) At process units with less than 0.25 percent leaking valves, Kodak may elect to monitor each valve once every 2 years.

Kodak shall keep a record of the monitoring schedule for each process unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 183: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 183.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 183.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to leak repair schedules and record keeping in accordance with the requirements of §63.1024 of Subpart UU.

Each leak detected shall be repaired as soon as practical,



but not later than 15 calendar days after it is detected. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

For each leak detected, the following information shall be recorded and maintained for 5 years beyond the date of the last use of the equipment:

- (1) The date of first attempt to repair the leak.
- (2) The date of successful repair of the leak.
- (3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak if Kodak has developed a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
- (5) Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 184: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 184.1:**

The Compliance Certification activity will be performed for:



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Emission Unit: U-00009

Regulated Contaminant(s):

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**Item 184.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to the requirements for identifying leaking equipment specified at §63.1023 of Subpart UU. When each equipment leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. The leak identification on a valve may be removed after it has been repaired and the valve has been monitored by Method 21 at least once within the first 3 months after its repair and no leak has been detected during that monitoring. The identification on pumps, agitators and connectors may be removed after it is repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 185: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 185.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 185.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Written plans for equipment monitoring, in accordance with the requirements of §63.1022(c)(4) in Subpart UU, shall be kept on site.

Kodak shall have a written plan that requires monitoring

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of equipment designated as unsafe-to-monitor as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment if a leak is detected.

Kodak shall have a written plan that requires monitoring of the equipment designated as difficult-to-monitor at least once per calendar year and repair of the equipment if a leak is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 186: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 186.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

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**Item 186.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Equipment subject to the MON MACT shall be identified according to the requirements specified at §63.1022 in Subpart UU. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods. Note: Equipment includes - pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices used to meet the MON MACT requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 187: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 187.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 187.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Wastewaters, subject to the MON MACT requirements for wastewater maintenance procedures according to the applicability identified in Table 7 of Subpart FFFF, must be compliant with Subpart F, 63.105(b) and (c).

Kodak shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance).

The descriptions shall:

- (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;
- (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- (3) Specify the procedures to be followed when clearing materials from process equipment.

Kodak shall modify and update the information in the Distilling maintenance wastewater plan (DIST/SOP-0116) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 188: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 188.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 188.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.148(a) of Subpart G for Vapor Collection System and Closed-vent System Inspections.

Kodak shall inspect each vapor collection system and closed-vent system according to the following procedures and schedule:

- (1) If the vapor collection system or closed vent system is constructed of hard-piping, Kodak shall conduct an initial inspection using Method 21 and conduct annual visual inspections for visible, audible, or olfactory indications of leaks.
- (2) If the vapor collection system or closed vent system is constructed of ductwork, Kodak shall conduct an initial and subsequent annual inspections using Method 21, and conduct annual visual inspections for visible, audible, or olfactory indications of leaks.

For each fixed roof, cover, and enclosure associated with vapor collection systems and closed-vent systems subject to MON MACT, Kodak shall conduct initial visual inspections and semi-annual visual inspections for visible, audible, or olfactory indications of leaks.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 189: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 189.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 189.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.147 of Subpart G for wastewater record keeping.

Kodak shall keep in a readily accessible location the following records for all Group 2 wastewater streams:

- (1) Process unit identification and description of the process unit;
- (2) Stream identification code;
- (3) For existing sources, concentration of Table 9 compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration; and
- (4) Flow rate in liter per minute.

If Kodak uses process knowledge to determine the annual average concentration of a wastewater stream and/or uses process knowledge to determine the annual average flow rate, and determines that the wastewater stream is not a Group 1 wastewater stream, Kodak shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 190: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 190.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 190.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.136 of Subpart G for wastewater drain systems.

Each individual drain system that receives or manages a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream shall be inspected initially, and semi- annually thereafter, for improper work practices and control equipment failures. For individual drain systems, improper work practice includes, but is not limited to, leaving open any access hatch or other opening when such hatch or opening is not in use for sampling or removal, or for equipment inspection, maintenance, or repair.

For individual drain systems, control equipment failure includes, but is not limited to, any time a joint, lid, cover, or door has a gap or crack, or is broken. When an improper work practice or a control equipment failure is identified, first efforts at repair shall be made no later than 5 calendar days after identification and repair shall be completed within 15 calendar days after identification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.



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The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 191: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485(j), Subpart FFFF**

**Item 191.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00009

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

**Item 191.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Kodak must determine the annual average concentration and annual average flow rate for wastewater streams for each MCPU. The procedures for flexible operation units do not apply for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 192: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 192.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00009

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

**Item 192.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Heat Exchange Systems, subject to the MON MACT



requirements for cooling water LDAR leak repair according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(d).

If a leak is detected, Kodak shall comply with the following requirements:

- (1) The leak shall be repaired as soon as practical but not later than 45 calendar days after Kodak receives results of monitoring tests indicating a leak. The leak shall be repaired unless Kodak demonstrates that the results are due to a condition other than a leak.
- (2) Once the leak has been repaired, Kodak shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown. All time periods shall be determined from the date when Kodak determines that delay of repair is necessary. If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.

If a shutdown is not expected within the next 2 months documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as practical. If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, Kodak may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. Kodak shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as follows:

- (1) Calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. Kodak may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in Table 4; and
- (2) Determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

If repair is delayed for any other reasons, Kodak may





delay repair up to a maximum of 120 calendar days. Kodak shall demonstrate that the necessary parts or personnel were not available.

Kodak shall retain the following records:

- (1) Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
- (2) Records of any leaks detected and the date the leak was discovered;
- (3) The dates of efforts to repair leaks; and
- (4) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

If Kodak invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported:

- (1) The presence of the leak and the date that the leak was detected;
- (2) Whether or not the leak has been repaired;
- (3) The reason(s) for delay of repair. If delay of repair is invoked because repair would cause greater emissions than the potential emissions from delaying repair, documentation of emissions estimates must also be submitted;
- (4) If the leak remains unrepaired, report the expected date of repair; and
- (5) If the leak is repaired, report the date the leak was successfully repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 193: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 193.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009



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

**Item 193.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water Leak Detection and Repair (LDAR) monitoring according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(b).

Kodak must monitor the cooling water for the presence of one or more organic hazardous air pollutants (HAPs) or other representative substances whose presence in cooling water indicates a leak. The cooling water shall be monitored for total HAPs, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system as follows:

- (1) The cooling water shall be monitored quarterly to detect leaks;
- (2) For recirculating heat exchange systems (cooling tower systems), the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F. For once-through heat exchange systems, the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in Table 9 of 40CFR Part 63, Subpart G;
- (3) The concentration of the monitored substance(s) in the cooling water shall be determined using any EPA-approved method as long as the method is sensitive to concentrations as low as 10 parts per million and the same method is used for both entrance and exit samples. Alternative methods may be used upon approval by the EPA;
- (4) The samples shall be collected either at the entrance and exit of each heat exchange system or at locations where the cooling water enters and exits each heat exchanger or any combination of heat exchangers. For samples taken at the entrance and exit of recirculating heat exchange systems, the entrance is the point at which the cooling water leaves the cooling tower prior to being returned to the process equipment and the exit is the point at which the cooling water is introduced to the cooling tower after being used to cool the process fluid. For samples taken at the entrance and exit of once-through



heat exchange systems, the entrance is the point at which the cooling water enters and the exit is the point at which the cooling water exits the plant site or chemical manufacturing process units. For samples taken at the entrance and exit of each heat exchanger or any combination of heat exchangers in chemical manufacturing process units, the entrance is the point at which the cooling water enters the individual heat exchanger or group of heat exchangers and the exit is the point at which the cooling water exits the heat exchanger or group of heat exchangers;

(5) A minimum of three sets of samples shall be taken at each entrance and exit. The average entrance and exit concentrations shall then be calculated. The concentration shall be corrected for the addition of any makeup water or for any evaporative losses, as applicable; and

(6) A leak is detected if the exit mean concentration is found to be greater than the entrance mean using a one-sided statistical procedure at the 0.05 level of significance and the amount by which it is greater is at least 1 part per million or 10 percent of the entrance mean, whichever is greater.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 194: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 194.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 194.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 40 CFR 63.2525(f), Kodak must keep a record of each time a safety device (e.g. a pressure relief valve, rupture disc, fusible plug, or any other type of device which functions exclusively to prevent

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physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere ) is opened to avoid unsafe conditions during the manufacture of a MON covered process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 195: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 195.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 195.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(g), for a Continuous Parameter Monitoring System (CPMS) on process vents (temperature monitor on Emission Control 32207 and liquid flow meters on Emission Controls 32213 and 32214), Kodak shall keep the following records:

(1) A record of the procedure used for calibrating the CPMS; and

(2) The results of each calibration check and all maintenance performed on the CPMS must be recorded including the date and time of completion of calibration and preventive maintenance of the CPMS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 196: Compliance Certification**

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**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 196.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 196.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c), Kodak must maintain a schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 197: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 197.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00009

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 197.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each operating scenario:

(1) A description of the process and the type of process



equipment used;

(2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;

(3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;

(4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;

(5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);

(6) The applicable monitoring requirements and any parametric level that assures compliance for all emissions routed to the control device or treatment process;

(7) Calculations and engineering analyses required to demonstrate compliance; and

(8) For reporting purposes, a change to any of these elements not previously reported, except for item (5) above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 198: Compliance with Federal regulations  
Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 236.2 (c)**

**Item 198.1:**

This Condition applies to Emission Unit: U-00009  
Process: H12

**Item 198.2:** Components subject to Federal regulations which require either an equal or more stringent leak detection and repair program, or equal or more stringent equipment specifications, are deemed to be in compliance with the provisions of this Part contingent on the source owner or operator complying with such Federal regulations.

**Condition 199: Compliance with 40 CFR Part 60, subpart DDD, III, NNN, or  
RRR  
Effective between the dates of 01/01/2012 and 12/31/2016**



**Applicable Federal Requirement:40CFR 63.2535(h), Subpart FFFF**

**Item 199.1:**

This Condition applies to Emission Unit: U-00009  
Process: H12

**Item 199.2:** After the compliance dates specified in §63.2445, if the facility has an MCPU that contains equipment subject to the provisions of this subpart that are also subject to the provisions of 40 CFR part 60, subpart DDD, III, NNN, or RRR, the applicant may elect to apply this subpart to all such equipment in the MCPU. If an MCPU subject to the provisions of this subpart has equipment to which this subpart does not apply but which is subject to a standard in 40 CFR part 60, subpart DDD, III, NNN, or RRR, the applicant may elect to comply with the requirements for Group 1 process vents in this subpart for such equipment. If the applicant elects any of these methods of compliance, they must consider all total organic compounds, minus methane and ethane, in such equipment for purposes of compliance with this subpart, as if they were organic HAP. Compliance with the provisions of this subpart, in the manner described in this paragraph (h), will constitute compliance with 40 CFR part 60, subpart DDD, III, NNN, or RRR, as applicable.

**Condition 200: Compliance with 40 CFR 60 Subpart VV and 40 CFR 61 Subpart V**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2535(k), Subpart FFFF**

**Item 200.1:**

This Condition applies to Emission Unit: U-00009  
Process: H12

**Item 200.2:** After the compliance date specified in §63.2445, if you have an affected source with equipment that is also subject to the requirements of 40 CFR part 60, subpart VV, or 40 CFR part 61, subpart V, you may elect to apply this subpart to all such equipment. After the compliance date specified in §63.2445, if you have an affected source with equipment to which this subpart does not apply, but which is subject to the requirements of 40 CFR part 60, subpart VV, or 40 CFR part 61, subpart V, you may elect to apply this subpart to all such equipment. If you elect either of these methods of compliance, you must consider all total organic compounds, minus methane and ethane, in such equipment for purposes of compliance with this subpart, as if they were organic HAP. Compliance with the provisions of this subpart, in the manner described in this paragraph (k), will constitute compliance with 40 CFR part 60, subpart VV and 40 CFR part 61, subpart V, as applicable.

**Condition 220: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 220.1:**

The Compliance Certification activity will be performed for the facility:

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The Compliance Certification applies to:

Emission Unit: U-00012  
Process: P03

Emission Unit: U-00012  
Process: P04

**Item 220.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.





The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 221: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 221.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012  
Process: P04

**Item 221.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 222: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 229.3 (e) (2) (v)**

**Item 222.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012  
Process: P15

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 222.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 223: Compliance Certification**

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**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.5 (d)**

**Item 223.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012  
Process: P15

Regulated Contaminant(s):  
CAS No: 0NY998-00-0    VOC

**Item 223.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 12 calendar month(s).

**Condition 224:    Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 224.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012                      Emission Point: 03054  
Process: P03                                      Emission Source: 030AC

Regulated Contaminant(s):  
CAS No: 0NY075-00-0    PARTICULATES

**Item 224.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, the pressure drop across the fabric filter (Control ID 03068) will be monitored weekly and maintained at a differential pressure of less



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than or equal to 2 inches of water. The fabric filter will be changed when the differential pressure exceeds 2 inches of water. Records shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 225: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 225.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012

Emission Point: 03055

Process: P03

Emission Source: 030AD

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 225.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, fabric filter bags (Control ID 03060) will be inspected monthly and replaced on a quarterly basis or sooner if necessary. Inspection and maintenance records shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 226: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 226.1:**

The Compliance Certification activity will be performed for:



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Emission Unit: U-00012  
Process: P03

Emission Point: 03062  
Emission Source: 030AH

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 226.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, the pressure drop across the HEPA filter (Control ID 03037) will be monitored weekly and maintained at a differential pressure of less than or equal to 2 inches of water. The HEPA filter will be changed when the differential pressure exceeds 2 inches of water. Records of pressure drop readings and filter changes shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 227: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 227.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012  
Process: P03

Emission Point: 030L0  
Emission Source: 030AM

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 227.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, fabric filter bags (Control ID 03017) will be inspected monthly and replaced every 4 months or sooner if necessary. Inspection and



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maintenance records shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 228: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 228.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012

Emission Point: 030L1

Process: P03

Emission Source: 030AN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 228.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, the pressure drop across the HEPA filter (Control ID 03067) will be monitored weekly and maintained at a differential pressure of less than or equal to 2 inches of water. The HEPA filter will be changed when the differential pressure exceeds 2 inches of water. Records of pressure drop readings and filter changes shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 229: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 229.1:**



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The Compliance Certification activity will be performed for:

Emission Unit: U-00012

Emission Point: 030L4

Process: P03

Emission Source: 030AQ

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 229.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, fabric filter bags (Control ID 03061) will be inspected weekly and replaced quarterly or sooner if necessary. Inspection and maintenance records shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 230: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 230.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012

Emission Point: 030M9

Process: P03

Emission Source: 030AV

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 230.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, fabric filter bags will be inspected monthly and replaced every 6 months or sooner if necessary. Inspection and maintenance records shall be kept on site and made available to the Department upon request.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-33: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.10 (c) (4) (iii)**

**Replaces Condition(s) 231**

**Item 1-33.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00012

Emission Point: 030N1

Process: P04

Emission Source: 030AW

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-33.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with VOC RACT requirements for the process vessels, as determined in the most recent RACT evaluation, dated March 2012, the total VOC emissions shall not exceed 8.0 tpy on a rolling twelve month basis. Additionally, the peak hourly emission rate is limited to 4.5 pounds per hour. Emissions of VOCs shall be calculated on a monthly basis and incorporated into a twelve month rolling total.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next re-evaluation shall be submitted no later than March 1, 2017.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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



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**Condition 1-34: Compliance Certification**  
Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Replaces Condition(s) 234**

**Item 1-34.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00016 Process: S13	Emission Point: 082X7 Emission Source: 082BE
Emission Unit: U-00016 Process: S13	Emission Point: 082X7 Emission Source: 082BF
Emission Unit: U-00016 Process: S13	Emission Point: 082X7 Emission Source: 082BG
Emission Unit: U-00016 Process: S13	Emission Point: 082X7 Emission Source: 082BK

**Item 1-34.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

Additionally, the permittee will investigate, in a timely

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 233: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.8000(b), Subpart HHHHH**

**Item 233.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00016

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

**Item 233.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Opening of a safety device, as defined in §63.8105, is allowed at any time conditions require it to avoid unsafe conditions. In accordance with 40 CFR 63.8080(c), a record must be kept of each time a safety device is opened.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-35: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 1-35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00016

Emission Point: 082X7

**Item 1-35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 3/2/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-36: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-36.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00021

**Item 1-36.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Emission Unit U-00021 includes emission sources which are permitted under more than one operating scenario. These operating scenarios are defined by Processes H80 and H81. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 244: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)**

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**Item 244.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):  
CAS No: 0NY998-00-0      VOC

**Item 244.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to satisfy the requirements of 6 NYCRR Part 229.3(e)(2)(v) for Emission Sources 120BE, 120BG, 120BH, 120BN, 120BP, 142BD and 142BF, Kodak shall equip all vertical volatile organic liquid tanks with a capacity of less than 10,000 gallons with a computerized vent control valve that acts as a conservation vent. The presence of these vents shall be monitored by verifying annually that they are in place and are functional. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Kodak shall notify the Department of any equipment or process changes that could potentially increase emissions of volatile organic compounds.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-37: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 229.5 (d)**

**Item 1-37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):  
CAS No: 0NY998-00-0      VOC

**Item 1-37.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

Subsequent reports are due every 12 calendar month(s).

**Condition 245: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2342(b), Subpart EEEE**

**Item 245.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 245.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For U-00021 organic liquid distribution operations subject to 40 CFR Part 63 Subpart EEEE, Kodak shall comply with the Subpart EEEE emission limitations, operating limits, and work practice standards for existing affected sources.

In accordance with 63.2342(b)(3)(i), 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. If compliance with the transfer rack emission limits cannot be achieved immediately, Kodak may submit a request for a compliance extension, as specified in paragraphs §63.2342(b)(3)(ii)(A) through (I). Kodak shall comply with all applicable Subpart EEEE requirements until an extension of compliance has been granted by the Administrator.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-38: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2343, Subpart EEEE**

**Replaces Condition(s) 246**

**Item 1-38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This condition establishes the notification, recordkeeping, and reporting requirements for U-00021 organic liquid distribution emission sources identified in §63.2338 that are subject to 40 CFR Part 63 Subpart EEEE but do not require control under the subpart (i.e., under paragraphs (a) through (e) of §63.2346). Such emission sources are not subject to any other notification, recordkeeping, or reporting sections in the subpart, including the Startup, Shutdown, and Malfunction Plan as referenced at §63.2350(c), except as follows:

(a) For each transfer rack subject to Subpart EEEE that only unloads organic liquids (i.e., no organic liquids are loaded at any of the transfer racks), Kodak must keep documentation that verifies that each such transfer rack is not required to be controlled. The documentation must be kept up-to-date (i.e., all such emission sources at a facility are identified in the documentation regardless of when the documentation was last compiled) and must be in a form suitable and readily available for expeditious inspection and review according to §63.10(b)(1), including records stored in electronic form in a separate location. The documentation may consist of identification of the tanks and transfer racks on a plant site plan or process and instrumentation diagram (P&ID).



(b) For each storage tank subject to Subpart EEEE having a capacity of 18.9 cubic meters (5,000 gallons) or more that is not subject to control based on the criteria specified in Table 2 to the subpart, items 1 through 6, Kodak must keep documentation, including a record of the annual average true vapor pressure of the total Table 1 organic HAP in the stored organic liquid, that verifies the storage tank is not required to be controlled under the subpart. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to §63.10(b)(1), including records stored in electronic form in a separate location.

(c) For each transfer rack subject to this subpart that loads organic liquids but is not subject to control based on the criteria specified in Table 2 to this subpart, items 7 through 10, Kodak must keep documentation, including the records specified in §63.2390(d), that verifies the transfer rack is not required to be controlled under this subpart. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to §63.10(b)(1), including records stored in electronic form in a separate location.

(d) If one or more of the following events occur after the filing of the last Compliance report, Kodak must submit a subsequent Compliance report:

- (1) Any storage tank or transfer rack became subject to control under subpart EEEE; or
- (2) Any storage tank equal to or greater than 18.9 cubic meters (5,000 gallons) became part of the affected source but is not subject to any of the emission limitations, operating limits, or work practice standards of the subpart; or
- (3) Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or
- (4) Any of the information required in §63.2386(c)(1), §63.2386(c)(2), or §63.2386(c)(3) has changed.

The subsequent Compliance report must contain the information in §63.2386(c)(1), (2), (3) and, as applicable, in §63.2386(d)(3) and (4). The report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31, and be postmarked no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

Kodak does not need to submit a separate subsequent Compliance report for each storage tank and/or transfer





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rack that meets these criteria (i.e., a single subsequent Compliance report should be submitted).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 247: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2346(c), Subpart EEEE**

**Item 247.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 247.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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. This condition only applies if the affected source has at least one storage tank or transfer rack that meets the applicability criteria for control in Table 2 to the Subpart.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 249: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**



**Applicable Federal Requirement: 40CFR 63.2378, Subpart EEEE**

**Item 249.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 249.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For U-00021 organic liquid distribution (OLD) operations subject to 40 CFR Part 63 Subpart EEEE, Kodak must demonstrate continuous compliance with each applicable emission limitation, operating limit, and work practice standard in Subpart EEEE Tables 2 through 4 according to the methods specified in 40 CFR Part 63 Subpart SS of this Part and in Subpart EEEE Tables 8 through 10, as applicable.

Kodak must follow the requirements in §63.6(e)(1) and (3) during periods of startup, shutdown, malfunction, or non-operation of the affected source or any Part thereof. In addition, the following provisions apply:

a) Subpart EEEE emission limitations apply at all times except during periods of nonoperation of the affected source (or specific portion thereof) resulting in cessation of the emissions to which this subpart applies. The emission limitations of this subpart apply during periods of SSM, except as provided in paragraphs (b)(2) and (3) of this section. However, if a SSM, or period of nonoperation of one portion of the affected source does not affect the ability of a particular emission source to comply with the emission limitations to which it is subject, then that emission source is still required to comply with the applicable emission limitations of this subpart during the startup, shutdown, malfunction, or period of nonoperation.

b) Kodak must not shut down control devices or monitoring systems that are required or utilized for achieving compliance with Subpart EEEE during periods of SSM while emissions are being routed to such items of equipment if the shutdown would contravene requirements of this subpart applicable to such items of equipment. This paragraph does not apply if the item of equipment is malfunctioning or if Kodak shuts down the compliance equipment (other than



monitoring systems) to avoid damage due to a contemporaneous SSM of the affected source or portion thereof. If Kodak has reason to believe that monitoring equipment would be damaged due to a contemporaneous SSM of the affected source of portion thereof, documentation supporting such a claim must be provided in the next Compliance report. Once approved by the Administrator, the provision for ceasing to collect, during a SSM, monitoring data that would otherwise be required by the provisions of this subpart must be incorporated into the SSM plan.

c) During SSM, Kodak must implement, to the extent reasonably available, measures to prevent or minimize excess emissions. For purposes of this paragraph, the term "excess emissions" means emissions greater than those allowed by the emission limits that apply during normal operational periods. The measures to be taken must be identified in the SSM plan, and may include, but are not limited to, air pollution control technologies, recovery technologies, work practices, pollution prevention, monitoring, and/or changes in the manner of operation of the affected source. Back-up control devices are not required, but may be used if available.

Periods of planned routine maintenance of a control device used to control storage tanks or transfer racks, during which the control device does not meet the emission limits in Table 2 to this subpart, must not exceed 240 hours per year.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-39: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2386, Subpart EEEE**

**Replaces Condition(s) 54**

**Item 1-39.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-39.2:**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For organic liquid distribution operations subject to 40 CFR Part 63 Subpart EEEE, Kodak must submit each applicable report in Subpart EEEE Tables 11 and 12, Subpart SS, and as identified in this condition. Reports must be submitted according to Subpart EEEE Table 11 and the dates established in this condition, by the dates shown in Subpart SS, and by the dates shown in Subpart EEEE Table 12, as applicable.

Periodic compliance reports must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31, and be postmarked no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

Compliance reports must contain the information in Subpart EEEE paragraphs §2386(c)(1) through (9) and, where applicable, paragraphs §2386(d)(1) through (4).

Kodak must report all deviations as defined in Subpart EEEE in the semiannual monitoring report required by 6NYCRR 201-6.5(c)(3)(ii). If Kodak submits a Compliance report pursuant to Subpart EEEE Table 11 along with, or as part of, the semiannual monitoring report required by 6NYCRR 201-6.5(c)(3)(ii), and the Compliance report includes all required information concerning deviations from any Subpart EEEE emission limitation, the Compliance report will satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report will not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the applicable Title V permitting authority.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 250: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2390, Subpart EEEE**

**Item 250.1:**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 250.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For U-00021 organic liquid distribution operations subject to 40 CFR Part 63 Subpart EEEE, Kodak must keep the following records:

- a) All records identified in §63.2343 for each emission source identified in §63.2338 that does not require control under the Subpart.
- b) Records of the total actual annual facility-level organic liquid loading volume as defined in §63.2406 through transfer racks to document the applicability, or lack thereof, of the emission limitations in Subpart EEEE Table 2, items 7 through 10.
- c) For each emission source identified in section 63.2338 that does require control under the subpart, Kodak must:
  - 1) Keep all records identified in 40 CFR 63 Subpart SS and in Subpart EEEE Table 12 that are applicable, including records related to notifications and reports, SSM, performance tests, CMS, and performance evaluation plans; and
  - 2) Keep the records required to show continuous compliance, as required in Subpart SS and in Subpart EEEE Tables 8 through 10, with each emission limitation, operating limit, and work practice standard that applies.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-40: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2398, Subpart EEEE**

**Replaces Condition(s) 55**

**Item 1-40.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



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

**Item 1-40.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of affected sources subject to 40CFR63 Subpart EEEE must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 12 of Subpart EEEE. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

The owner or operator of an applicable source using a control device to comply with the emission standard shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 252: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2435(d), Subpart FFFF**

**Item 252.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

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

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 252.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the predominant use of a transfer rack loading arm or storage tank (including storage tanks in series) is associated with a miscellaneous organic chemical manufacturing process, and the loading arm or storage tank is not part of an affected source under any other MACT rule, then Kodak must assign the loading arm or storage tank to the MCPU for that miscellaneous organic chemical manufacturing process. If the predominant use cannot be determined, then Kodak may assign the loading arm or storage tank to any MCPU that shares it and is subject to the MON MACT. If the use varies from year to year, then Kodak must base the determination on the utilization that occurred during the year preceding November 10, 2003 or, if the loading arm or storage tank was not in operation during that year, Kodak must base the use on the expected use for the first 5-year period after startup. Kodak must include the determination in the notification of compliance status report. Kodak must redetermine the primary use at least once every 5 years, or any time Kodak implements emissions averaging or pollution prevention after May 10, 2008.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-41: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 256**

**Item 1-41.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-41.2:**

Compliance Certification shall include the following monitoring:

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Facility DEC ID: 8261400205



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The closed-vent control systems and control devices vented to Emission Points 12007 and 14201 are subject to the equipment leak record keeping requirements specified under §63.998(d)(4) of Subpart SS.

Kodak shall maintain records of the following information for closed vent systems and control devices:

(1) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams; the dates and descriptions of any changes in the design specifications; and a description of the parameter or parameters monitored to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. These records shall be retained for the life of the equipment.

(2) Dates and durations when the closed vent systems and control devices required are not operated as designed as indicated by the monitored parameters; dates and durations during which the monitoring system or monitoring device is inoperative; and dates and durations of start-ups and shutdowns of required control devices. These records shall be retained for 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-42: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 253**

**Item 1-42.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-42.2:**



**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Closed-vent control systems vented to Emission Points 12007 and 14201, are subject to the inspection and monitoring requirements specified under §63.983(b) of Subpart SS.

Except for any closed vent systems that are designated as unsafe or difficult to inspect, each closed vent system shall be inspected, in accordance with the requirements of §63.983(b), as follows:

- (1) If the closed vent system is constructed of hard-piping, Kodak shall conduct an initial inspection and conduct annual inspections for visible, audible, or olfactory indications of leaks. If the closed vent system is constructed of ductwork, Kodak shall conduct an initial and annual inspection using Method 21.
- (2) Any parts of the closed vent system that are designated as unsafe to inspect are exempt from the inspection requirements if Kodak determines that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying; and Kodak has a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times. Inspection is not required more than once annually.
- (3) Any parts of the closed vent system that are designated as difficult-to-inspect are exempt from the inspection requirements if Kodak determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface and Kodak has a written plan that requires inspection of the equipment at least once every 5 years.

Inspection records shall be generated.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-43: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 254**

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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 1-43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-43.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Closed Vent Systems vented to Emission Points 12007 and 14201 are subject to leak repair requirements specified at §63.983(d) of Subpart SS. If there are visible, audible, or olfactory indications of leaks from closed vent systems at the time of the annual visual inspections, Kodak shall eliminate the leak or monitor the equipment using Method 21. Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired as soon as practical.

A first attempt at repair shall be made no later than 5 days after the leak is detected. Repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later.

Delay of repair of a closed vent system for which leaks have been detected is allowed if repair within 15 days after a leak is detected is technically infeasible or unsafe without a closed vent system shutdown, or if Kodak determines that emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed as soon as practical, but not later than the end of the next closed vent system shutdown.

The following records shall be generated when a leak is detected:

- (1) The instrument and the equipment identification number and the operator name, initials, or identification number;
- (2) The date the leak was detected and the date of the first attempt to repair the leak;
- (3) The date of successful repair of the leak;
- (4) The maximum instrument reading measured after the leak is successfully repaired or determined to be nonrepairable;



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(5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. Kodak may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure; and

(6) Copies of the Periodic Reports, if records are not maintained on a computerized database capable of generating summary reports from the records.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-44: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 258**

**Item 1-44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Bypass lines are subject the inspection and monitoring requirements specified at §63.983(b)(4) of Subpart SS.

For each bypass line, if a flow indicator is used, Kodak shall take a reading at least once every 15 minutes or if the bypass line valve is secured in the non-diverting position, Kodak shall visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



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Facility DEC ID: 8261400205

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-45: Compliance Certification**  
Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 255**

**Item 1-45.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 1-45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.998(d)(5) of Subpart SS, Kodak shall record the occurrences and the cause of periods when the monitored parameters are outside of the parameter ranges documented in the Notification of Compliance Status report. This information shall also be reported in the Periodic Report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 257: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 257.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

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Facility DEC ID: 8261400205



CAS No: ONY100-00-0 TOTAL HAP

**Item 257.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to Start-up, Shutdown, and Malfunction Record Keeping requirements specified under §63.998(d)(3) of Subpart SS. Kodak shall maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment used to comply with the MON MACT during which excess emissions occur. For each start-up, shutdown, and malfunction during which excess emissions occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing control device emissions to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 259: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2455(b), Subpart FFFF**

**Item 259.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



CAS No: ONY100-00-0 TOTAL HAP

**Item 259.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each continuous process vent, Kodak shall either designate the vent as a Group 1 continuous process vent or determine the total resource effectiveness (TRE) index value as specified in §63.115(d). Continuous process vents with TRE index values less than or equal to 1.9 are Group 1 process vents.

Records of TRE calculations shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-46: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2460(b), Subpart FFFF**

**Replaces Condition(s) 260**

**Item 1-46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 1-46.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to satisfy the requirements for processes with batch process vents, Kodak must determine the group status of each batch process vent. For batch processes with organic HAP usage greater than 10,000 lb/yr, Kodak shall determine and sum the uncontrolled organic HAP emissions from each of the batch process vents within the process using the procedures specified in §63.1257(d)(2)(i) and



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(ii), except as specified in paragraphs 2460(b)(1) through (7).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 261: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2470(a), Subpart FFFF**

**Item 261.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 261.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall determine the group status of each storage tank storing materials containing more than 5% HAP.

Storage tanks with a capacity greater than or equal to 10,000 gal storing material that has a maximum true vapor pressure of total HAP greater than or equal to 6.9 kilopascals (1.0 psi) at an existing source are Group 1 storage tanks.

Records of tank capacities and total HAP vapor pressures shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 262: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Applicable Federal Requirement:40CFR 63.2470(d), Subpart FFFF**

**Item 262.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 262.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emission limits in table 4 of subpart FFFF for control devices used to control emissions from storage tanks do not apply during periods of planned routine maintenance.

Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit specified in table 4 of subpart FFFF, must not exceed 240 hours/year.

The facility may submit an application to NYSDEC requesting an extension of this time limit to a total of 360 hr/yr. The application must explain why the extension is needed, it must indicate that no material will be added to the storage tank between the time the 240 hour limit is exceeded and the control device is again operational, and it must be submitted at least 60 days before the 240 hour limit will be exceeded.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 263: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2475, Subpart FFFF**

**Item 263.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021



**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 263.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall determine the group status of each transfer rack that transfers materials containing more than 5% HAP.

Transfer racks that load more than 0.65 million liters/year (0.17 million gallons/year) of liquids that contain organic HAP with a rack-weighted average partial pressure, as defined in §63.111, greater than or equal to 1.5 pound per square inch absolute are Group 1 transfer racks.

Records of transfer rack annual loading volumes and HAP rack-weighted average partial pressure calculations shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 264: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 264.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 264.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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In accordance with the requirements specified at §63.1022(b)(5) of Subpart UU, the identity, either by list, location (area or group), or other method, of equipment in regulated material service less than 300 hours per calendar year within a process unit or affected facilities subject to the MON MACT shall be recorded.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 265: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 265.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 265.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall monitor each valve at the intervals described below to detect leaks by Method 21. The instrument reading that defines a leak is 500 parts per million or greater for all valves in gas and vapor service and in light liquid service.

In accordance with §63.1025(b) of Subpart UU, Kodak shall monitor valves for leaks at the following intervals:

- (1) If at least the greater of 2 valves or 2 percent of the valves in a process unit leak Kodak shall monitor each valve once per month.
- (2) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, Kodak shall monitor each valve once each quarter. Monitoring data generated before the regulated source became subject to the MON MACT may be used to qualify initially for less frequent monitoring.
- (3) At process units with less than 1 percent leaking valves, Kodak may elect to monitor each valve once every

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two quarters.

(4) At process units with less than 0.5 percent leaking valves, Kodak may elect to monitor each valve once every four quarters.

(5) At process units with less than 0.25 percent leaking valves, Kodak may elect to monitor each valve once every 2 years.

Kodak shall keep a record of the monitoring schedule for each process unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 266: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 266.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 266.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for pumps shall be conducted in accordance with the requirements of §63.1026 of Subpart UU.

(a) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. Kodak shall document that the inspection was conducted and the date of the inspection.

If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, Kodak shall:

(1) Monitor the pump using Method 21. If the instrument reading indicates a leak, a leak is detected and it shall

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be repaired; or  
(2) Kodak shall eliminate the visual indications of liquids dripping.

(b) Since all pumps in Distilling East are part of a single MCPU, Kodak shall monitor each pump monthly to detect leaks by Method 21. The instrument reading that defines a leak is:

(1) 1,000 parts per million or greater for all pumps with single mechanical seals associated with "batch process vents"; and

(2) 1,000 parts per million or greater for all pumps with single mechanical seals associated with "continuous process vents".

For pumps to which a 1,000 parts per million leak definition applies, repair is not required unless an instrument reading of 2,000 parts per million or greater is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 267: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 267.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 267.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak Detection and Repair (LDAR) monitoring for open-ended valves or lines shall be conducted in accordance with §63.1033(a) of Subpart UU.



Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply at all other times.

Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from these requirements.

Open-ended valves or lines containing materials that would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system are also exempt from these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 268: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 268.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 268.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection and Repair (LDAR) Monitoring for pressure



relief devices in gas and vapor service shall be conducted in accordance with §63.1030(a) of Subpart UU.

Except during pressure releases, each pressure relief device in gas and vapor service shall be operated with an instrument reading of less than 500 parts per million as measured by Method 21. Unless the delay of repair provisions apply, after each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million, as soon as practical, but no later than 5 calendar days after each pressure release. The pressure relief device shall be monitored no later than five calendar days after the pressure release to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by Method 21.

Kodak shall record the dates and results of the monitoring following a pressure release including the background level measured and the maximum instrument reading measured during the monitoring.

Any pressure relief device that is routed to a process gas system or is equipped with a closed vent system capable of capturing and transporting leakage from the pressure relief device to a control device is exempt from these monitoring requirements.

Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from these monitoring requirements provided that Kodak installs a replacement rupture disk upstream of the pressure relief device as soon as practical after each pressure release but no later than 5 calendar days after each pressure release, unless the delay of repair provisions apply.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 269: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 269.1:**

The Compliance Certification activity will be performed for:

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Facility DEC ID: 8261400205



Emission Unit: U-00021  
Process: H81

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

**Item 269.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to the requirements for identifying leaking equipment specified at §63.1023 of Subpart UU. When each equipment leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. The leak identification on a valve may be removed after it has been repaired and the valve has been monitored by Method 21 at least once within the first 3 months after its repair and no leak has been detected during that monitoring. The identification on pumps, agitators and connectors may be removed after it is repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 270: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 270.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021  
Process: H81

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

**Item 270.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Written plans for equipment monitoring, in accordance with the requirements of §63.1022(c)(4) in Subpart UU, shall be kept on site.

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Kodak shall have a written plan that requires monitoring of equipment designated as unsafe-to-monitor as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment if a leak is detected.

Kodak shall have a written plan that requires monitoring of the equipment designated as difficult-to-monitor at least once per calendar year and repair of the equipment if a leak is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 271: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 271.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 271.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to leak repair schedules and record keeping in accordance with the requirements of §63.1024 of Subpart UU.

Each leak detected shall be repaired as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or



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replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

For each leak detected, the following information shall be recorded and maintained for 5 years beyond the date of the last use of the equipment:

- (1) The date of first attempt to repair the leak.
- (2) The date of successful repair of the leak.
- (3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak if Kodak has developed a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
- (5) Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 272: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 272.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 272.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Equipment subject to the MON MACT shall be identified according to the requirements specified at §63.1022 in Subpart UU. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods. Note: Equipment includes - pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices used to meet the MON MACT requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 273: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 273.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 273.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.148(a) of Subpart G for Vapor Collection System and Closed-vent System Inspections.

Kodak shall inspect each vapor collection system and closed-vent system according to the following procedures and schedule:

(1) If the vapor collection system or closed vent system

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is constructed of hard-piping, Kodak shall conduct an initial inspection using Method 21 and conduct annual visual inspections for visible, audible, or olfactory indications of leaks.

(2) If the vapor collection system or closed vent system is constructed of ductwork, Kodak shall conduct an initial and subsequent annual inspections using Method 21, and conduct annual visual inspections for visible, audible, or olfactory indications of leaks.

For each fixed roof, cover, and enclosure associated with vapor collection systems and closed-vent systems subject to MON MACT, Kodak shall conduct initial visual inspections and semi-annual visual inspections for visible, audible, or olfactory indications of leaks.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 274: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 274.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 274.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Wastewaters, subject to the MON MACT requirements for wastewater maintenance procedures according to the applicability identified in Table 7 of Subpart FFFF, must be compliant with Subpart F, 63.105(b) and (c).

Kodak shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance,

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and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance).

The descriptions shall:

- (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;
- (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- (3) Specify the procedures to be followed when clearing materials from process equipment.

Kodak shall modify and update the information in the Distilling maintenance wastewater plan (DIST/SOP-0116) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 275: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 275.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 275.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.136 of Subpart G for wastewater drain systems.

Each individual drain system that receives or manages a Group 1 wastewater stream or a residual removed from a

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Group 1 wastewater stream shall be inspected initially, and semi- annually thereafter, for improper work practices and control equipment failures. For individual drain systems, improper work practice includes, but is not limited to, leaving open any access hatch or other opening when such hatch or opening is not in use for sampling or removal, or for equipment inspection, maintenance, or repair.

For individual drain systems, control equipment failure includes, but is not limited to, any time a joint, lid, cover, or door has a gap or crack, or is broken. When an improper work practice or a control equipment failure is identified, first efforts at repair shall be made no later than 5 calendar days after identification and repair shall be completed within 15 calendar days after identification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 276: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 276.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 276.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.147 of Subpart G for wastewater record keeping.

Kodak shall keep in a readily accessible location the following records for all Group 2 wastewater streams:

(1) Process unit identification and description of the process unit;

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- (2) Stream identification code;
- (3) For existing sources, concentration of Table 9 compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration; and
- (4) Flow rate in liter per minute.

If Kodak uses process knowledge to determine the annual average concentration of a wastewater stream and/or uses process knowledge to determine the annual average flow rate, and determines that the wastewater stream is not a Group 1 wastewater stream, Kodak shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 277: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2485(j), Subpart FFFF**

**Item 277.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 277.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak must determine the annual average concentration and annual average flow rate for wastewater streams for each MCPU. The procedures for flexible operation units do not apply for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 278: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 278.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 278.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water Leak Detection and Repair (LDAR) monitoring according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(b).

Kodak must monitor the cooling water for the presence of one or more organic hazardous air pollutants (HAPs) or other representative substances whose presence in cooling water indicates a leak. The cooling water shall be monitored for total HAPs, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system as follows:

- (1) The cooling water shall be monitored quarterly to detect leaks;
- (2) For recirculating heat exchange systems (cooling tower systems), the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F. For once-through heat exchange systems, the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in Table 9 of 40CFR Part 63, Subpart G;
- (3) The concentration of the monitored substance(s) in the cooling water shall be determined using any EPA-approved



method as long as the method is sensitive to concentrations as low as 10 parts per million and the same method is used for both entrance and exit samples.

Alternative methods may be used upon approval by the EPA;

(4) The samples shall be collected either at the entrance and exit of each heat exchange system or at locations where the cooling water enters and exits each heat exchanger or any combination of heat exchangers. For samples taken at the entrance and exit of recirculating heat exchange systems, the entrance is the point at which the cooling water leaves the cooling tower prior to being returned to the process equipment and the exit is the point at which the cooling water is introduced to the cooling tower after being used to cool the process fluid. For samples taken at the entrance and exit of once-through heat exchange systems, the entrance is the point at which the cooling water enters and the exit is the point at which the cooling water exits the plant site or chemical manufacturing process units. For samples taken at the entrance and exit of each heat exchanger or any combination of heat exchangers in chemical manufacturing process units, the entrance is the point at which the cooling water enters the individual heat exchanger or group of heat exchangers and the exit is the point at which the cooling water exits the heat exchanger or group of heat exchangers;

(5) A minimum of three sets of samples shall be taken at each entrance and exit. The average entrance and exit concentrations shall then be calculated. The concentration shall be corrected for the addition of any makeup water or for any evaporative losses, as applicable; and

(6) A leak is detected if the exit mean concentration is found to be greater than the entrance mean using a one-sided statistical procedure at the 0.05 level of significance and the amount by which it is greater is at least 1 part per million or 10 percent of the entrance mean, whichever is greater.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 279: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 279.1:**



**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 279.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water LDAR leak repair according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(d).

If a leak is detected, Kodak shall comply with the following requirements:

(1) The leak shall be repaired as soon as practical but not later than 45 calendar days after Kodak receives results of monitoring tests indicating a leak. The leak shall be repaired unless Kodak demonstrates that the results are due to a condition other than a leak.

(2) Once the leak has been repaired, Kodak shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown. All time periods shall be determined from the date when Kodak determines that delay of repair is necessary. If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.

If a shutdown is not expected within the next 2 months documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as practical. If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, Kodak may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. Kodak shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as follows:



- (1) Calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. Kodak may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in Table 4; and
- (2) Determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

If repair is delayed for any other reasons, Kodak may delay repair up to a maximum of 120 calendar days. Kodak shall demonstrate that the necessary parts or personnel were not available.

Kodak shall retain the following records:

- (1) Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
- (2) Records of any leaks detected and the date the leak was discovered;
- (3) The dates of efforts to repair leaks; and
- (4) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

If Kodak invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported:

- (1) The presence of the leak and the date that the leak was detected;
- (2) Whether or not the leak has been repaired;
- (3) The reason(s) for delay of repair. If delay of repair is invoked because repair would cause greater emissions than the potential emissions from delaying repair, documentation of emissions estimates must also be submitted;
- (4) If the leak remains unrepaired, report the expected date of repair; and
- (5) If the leak is repaired, report the date the leak was successfully repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205

Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-47: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Replaces Condition(s) 282**

**Item 1-47.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021  
Process: H81

Regulated Contaminant(s):  
CAS No: ONY100-00-0 TOTAL HAP

**Item 1-47.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(g), for a Continuous Parameter Monitoring System (CPMS) on process vents (Liquid flow meters on Emission Controls 12001 and 12006, and 14201 and 14202), Kodak shall keep the following records:

- (1) A record of the procedure used for calibrating the CPMS; and
- (2) The results of each calibration check and all maintenance performed on the CPMS must be recorded including the date and time of completion of calibration and preventive maintenance of the CPMS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 280: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 280.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 280.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(e), Kodak shall keep records for Group 2 Batch Process Vents as follows:

For Low Volume Group 2 processes with < 10,000 lb/yr OHAP usage Kodak must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the third paragraph below. After 1 year, Kodak may revert to recording only usage if the usage during the year is less than 10,000 lb.

For Mid Volume Group 2 processes with < 1,000 lb/yr OHAP emissions Kodak must keep records of the number of batches operated and calculate a daily rolling annual sum of batches operated no less frequently than monthly. If the number of batches operated results in organic HAP emissions that exceed 1,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the paragraph below. After 1 year, Kodak may revert to recording only the number of batches if the number of batches operated during the year results in less than 1,000 lb of organic HAP emissions.

For High Volume Group 2 processes with > 1,000 lb/yr OHAP emissions Kodak must keep the following records:

- (i) A record of the day each batch was completed and/or the operating hours per day for continuous operations with hydrogen halide and halogen emissions;
- (ii) A record of whether each batch operated was considered a standard batch;
- (iii) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch; and
- (iv) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less

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frequently than monthly.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 281: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 281.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 281.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c),  
Kodak must maintain a schedule or log of operating  
scenarios for processes with batch vents from batch  
operations updated each time a different operating  
scenario is put into effect.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 283: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 283.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Process: H81



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

**Item 283.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 40 CFR 63.2525(f), Kodak must keep a record of each time a safety device (e.g. a pressure relief valve, rupture disc, fusible plug, or any other type of device which functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere ) is opened to avoid unsafe conditions during the manufacture of a MON covered process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 284: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 284.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021  
Process: H81

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

**Item 284.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each operating scenario:  
(1) A description of the process and the type of process equipment used;  
(2) An identification of related process vents, including their associated emissions episodes if not complying with

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- the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;
- (3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;
  - (4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;
  - (5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);
  - (6) The applicable monitoring requirements and any parametric level that assures compliance for all emissions routed to the control device or treatment process;
  - (7) Calculations and engineering analyses required to demonstrate compliance; and
  - (8) For reporting purposes, a change to any of these elements not previously reported, except for item (5) above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-48: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)**

**Replaces Condition(s) 285**

**Item 1-48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Emission Point: 11601

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6NYCRR Part 212.10 VOC RACT (Reasonably Available Control Technology) requirements for emissions of volatile organic compounds (VOC) from Emission Point 11601, emission limits have been

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established for this source. Based on the RACT evaluation, dated February 2014, the aggregate annual emissions of VOCs regulated by Part 212 from EP 11601 (ES 116BA) shall not exceed 0.14 tons per year (tpy) on a rolling twelve-month basis. Emissions of VOCs shall be calculated using material throughput records incorporated into a twelve-month rolling total, expressed in tpy.

These records shall be retained on site for five years and made available to the Department upon request. This RACT determination shall be re-evaluated every five years or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next re-evaluation shall be submitted no later than March 1, 2019.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-49: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (i)**

**Replaces Condition(s) 286**

**Item 1-49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Emission Point: 12007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-49.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of Part 212.10 VOC RACT (Volatile Organic Compounds) (Reasonably Available Control Technology) and to comply with 40 CFR 64 CAM (Compliance Assurance Monitoring), the scrubbers (Control Devices 12001 and 12006) associated with Emission Sources 120BB, 120BC, 120BD, 120BE, 120BF, 120BG, 120BH, 120BJ, 120BK, 120BL, 120BT, 120BU and 120BW shall be maintained and operated to provide an overall removal efficiency of





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VOCs of at least 81%. In order to demonstrate compliance with this requirement, Kodak shall maintain the fluid flow rates for the scrubbers (Control Devices 12001 and/or 12006) as given below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 1,500 kg/hr;
- b) the controller setpoint for specific gravity of recirculated methanol as a scrubbing solution shall be maintained at or below 0.82;
- c) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 30 kg/hr; and
- d) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 300 kg/hr.

The flow rates shall be continuously monitored and the daily averages shall be recorded while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: MASS FLOW RATE  
Lower Permit Limit: 1,500 kilograms per hour  
Monitoring Frequency: CONTINUOUS  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-50: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63, Subpart FFFF**

**Item 1-50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021                      Emission Point: 12007  
Process: H81

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

**Item 1-50.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Sources 120BC, 120BH, 120BJ, 120BL, 120BT, 120BU and 120BW, in Process H81 are subject to the control requirements of the MON MACT according to 40 CFR 63.2455 (continuous process vents), 63.2470 (storage tanks) and 63.2475 (transfer racks). In order to comply with these requirements, the scrubbers (Control Devices 12001 and 12006) shall be maintained and operated to provide an overall removal efficiency of HAPs of at least 95%.

In order to demonstrate compliance with these requirements, Kodak shall maintain the fluid flow rates for the scrubbers (Control Devices 12001 and 12006) as stated below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 1,500 kg/hr;
- b) the controller setpoint for specific gravity of recirculated methanol as a scrubbing solution shall be maintained at or below 0.82;
- c) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 30 kg/hr; and
- d) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 300 kg/hr.

The flow rates shall be continuously monitored and the daily averages shall be recorded while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: MASS FLOW RATE

Lower Permit Limit: 1,500 kilograms per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-51: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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**Applicable Federal Requirement:6 NYCRR 212.10 (c) (4) (iii)**

**Replaces Condition(s) 287**

**Item 1-51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021

Emission Point: 120A5

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with VOC RACT requirements for Emission Sources 120BM, 120BN, 120BP, 120BV and 120BY, as determined in the most recent RACT evaluation dated March 2012, the total VOC emissions shall not exceed 4.1 tpy on a rolling twelve month basis.

Emissions subject to this RACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment and vapor pressure data.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next re-evaluation shall be submitted no later than March 1, 2017.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-52: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.10 (c) (4) (i)**

**Replaces Condition(s) 288**

**Item 1-52.1:**

The Compliance Certification activity will be performed for:



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Permit ID: 8-2614-00205/01801

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Emission Unit: U-00021

Emission Point: 14201

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-52.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with Part 212.10 VOC RACT (Volatile Organic Compounds Reasonably Available Control Technology) and to comply with 40 CFR 64 CAM (Compliance Assurance Monitoring), the scrubbers (Emission Control Devices 14201 and 14202) associated with emission sources 115BA, 116BB, 142BA, 142BB, 142BC, 142BD, 142BE, 142BF, 142BG, 142BH, 142BJ, 142BK, 142BL and D63BB shall be maintained and operated to provide an overall removal efficiency of VOCs of at least 81%.

In order to demonstrate compliance with this requirement, Kodak shall maintain the fluid flow rates for the scrubbers (Control Devices 14201 and/or 14202) as given below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 3,300 kg/hr;
- b) the controller setpoint for specific gravity of recirculated methanol as a scrubbing solution shall be maintained at or below 0.82;
- c) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 30 kg/hr; and
- d) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 175 kg/hr.

The flow rates shall be continuously monitored and the daily averages shall be recorded while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: MASS FLOW RATE

Lower Permit Limit: 3300 kilograms per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-53: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2346(a), Subpart EEEE**

**Replaces Condition(s) 289**

**Item 1-53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021                      Emission Point: 14201  
Process: H80

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

**Item 1-53.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Sources 142BE and 142BF in Process H80 are subject to the control requirements of the OLD MACT for storage tanks. In order to comply with these requirements (specified in 63.2346, 63.2366 and 63.2374), the scrubbers (Control Devices 14201 and 14202) shall be maintained and operated to provide an overall removal efficiency of HAPs of at least 95%.

In order to demonstrate compliance with these requirements, Kodak shall maintain the fluid flow rates for the scrubbers (Control Devices 14201 and 14202) as given below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 3,300 kg/hr;
- b) the controller setpoint for specific gravity of recirculated methanol as a scrubbing solution shall be maintained at or below 0.82;
- c) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 30 kg/hr; and
- d) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 175 kg/hr.

The flow rates shall be continuously monitored and the daily averages shall be recorded while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made

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available to the Department upon request.

Parameter Monitored: MASS FLOW RATE  
Lower Permit Limit: 3300 kilograms per hour  
Monitoring Frequency: CONTINUOUS  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-54: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63, Subpart FFFF**

**Replaces Condition(s) 290**

**Item 1-54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00021                      Emission Point: 14201  
Process: H81

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

**Item 1-54.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Sources 115BA, 116BB, 142BB, 142BH, 142BJ and 142BK, in Process H81 are subject to the control requirements of the MON MACT according to 40 CFR 63.2455 (continuous process vents), 63.2470 (storage tanks) and 63.2475 (transfer racks). In order to comply with these requirements, the scrubbers (Control Devices 14201 and 14202) shall be maintained and operated to provide an overall removal efficiency of HAPs of at least 95%.

In order to demonstrate compliance with these requirements, Kodak shall maintain the fluid flow rates for the scrubbers (Control Devices 14201 and 14202) as given below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 3,300 kg/hr;
- b) the controller setpoint for specific gravity of recirculated methanol as a scrubbing solution shall be



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- maintained at or below 0.82;
- c) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 30 kg/hr; and
- d) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 175 kg/hr.

The flow rates shall be continuously monitored and the daily averages shall be recorded while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: MASS FLOW RATE  
 Lower Permit Limit: 3300 kilograms per hour  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 60 days after the reporting period.  
 The initial report is due 4/1/2015.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-55: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Replaces Condition(s) 292**

**Item 1-55.1:**  
 The Compliance Certification activity will be performed for the facility:  
 The Compliance Certification applies to:

Emission Unit: U-00023 Process: H06	Emission Point: 08229 Emission Source: 082BN
Emission Unit: U-00023 Process: H06	Emission Point: 08229 Emission Source: 082BO
Emission Unit: U-00023 Process: H06	Emission Point: 11201 Emission Source: 112AA
Emission Unit: U-00023 Process: H07	Emission Point: 103A6

**Item 1-55.2:**  
 Compliance Certification shall include the following monitoring:

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

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In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-56: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**





**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Replaces Condition(s) 293**

**Item 1-56.1:**

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

Emission Unit: U-00023	Emission Point: 08229
Emission Unit: U-00023	Emission Point: 103A6
Emission Unit: U-00023	Emission Point: 11201
Emission Unit: U-00023	Emission Point: 112A1

**Item 1-56.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 294: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 294.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023  
Process: H07

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

**Item 294.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak Detection and Repair (LDAR) monitoring for open-ended valves or lines shall be conducted in accordance with §63.1033(a) of Subpart UU.

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply at all other times.

Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from these requirements.

Open-ended valves or lines containing materials that would

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autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system are also exempt from these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 295: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 295.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 295.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to leak repair schedules and record keeping in accordance with the requirements of §63.1024 of Subpart UU.

Each leak detected shall be repaired as soon as practical, but not later than 15 calendar days after it is detected.

A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

For each leak detected, the following information shall be recorded and maintained for 5 years beyond the date of the last use of the equipment:

(1) The date of first attempt to repair the leak.

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- (2) The date of successful repair of the leak.
- (3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak if Kodak has developed a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
- (5) Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 296: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 296.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023  
Process: H07

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

**Item 296.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Kodak shall monitor each valve at the intervals described below to detect leaks by Method 21. The instrument reading that defines a leak is 500 parts per million or greater for all valves in gas and vapor service and in light liquid service.

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In accordance with §63.1025(b) of Subpart UU, Kodak shall monitor valves for leaks at the following intervals:

- (1) If at least the greater of 2 valves or 2 percent of the valves in a process unit leak Kodak shall monitor each valve once per month.
- (2) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, Kodak shall monitor each valve once each quarter. Monitoring data generated before the regulated source became subject to the MON MACT may be used to qualify initially for less frequent monitoring.
- (3) At process units with less than 1 percent leaking valves, Kodak may elect to monitor each valve once every two quarters.
- (4) At process units with less than 0.5 percent leaking valves, Kodak may elect to monitor each valve once every four quarters.
- (5) At process units with less than 0.25 percent leaking valves, Kodak may elect to monitor each valve once every 2 years.

Kodak shall keep a record of the monitoring schedule for each process unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 297: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 297.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 297.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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Equipment subject to the MON MACT shall be identified according to the requirements specified at §63.1022 in Subpart UU. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods. Note: Equipment includes - pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices used to meet the MON MACT requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 298: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 298.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 298.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to the requirements for identifying leaking equipment specified at §63.1023 of Subpart UU. When each equipment leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. The leak identification on a valve may be removed after it has been repaired and the valve has been monitored by Method 21 at least once within the first 3 months after its repair and no leak has been detected during that monitoring. The identification on pumps, agitators and connectors may be removed after it is repaired.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 299: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 299.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 299.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.147 of Subpart G for wastewater record keeping.

Kodak shall keep in a readily accessible location the following records for all Group 2 wastewater streams:

- (1) Process unit identification and description of the process unit;
- (2) Stream identification code;
- (3) For existing sources, concentration of Table 9 compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration; and
- (4) Flow rate in liter per minute.

If Kodak uses process knowledge to determine the annual average concentration of a wastewater stream and/or uses process knowledge to determine the annual average flow rate, and determines that the wastewater stream is not a Group 1 wastewater stream, Kodak shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 300: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 300.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 300.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Wastewaters, subject to the MON MACT requirements for wastewater maintenance procedures according to the applicability identified in Table 7 of Subpart FFFF, must be compliant with Subpart F, 63.105(b) and (c).

Kodak shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance).

The descriptions shall:

- (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;
- (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- (3) Specify the procedures to be followed when clearing materials from process equipment.

Kodak shall modify and update the information in the SCD maintenance wastewater plan (SCD SOP-0152) as needed





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following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 301: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485(j), Subpart FFFF**

**Item 301.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 301.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak must determine the annual average concentration and annual average flow rate for wastewater streams for each MCPU. The procedures for flexible operation units do not apply for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 302: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 302.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

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

**Item 302.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(e), Kodak shall keep records for Group 2 Batch Process Vents as follows:

For Low Volume Group 2 processes with < 10,000 lb/yr OHAP usage Kodak must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in 63.2525(e)(4). After 1 year, Kodak may revert to recording only usage if the usage during the year is less than 10,000 lb.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 303: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 303.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023  
Process: H07

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

**Item 303.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c), Kodak must maintain a schedule or log of operating

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scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 304: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 304.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Process: H07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 304.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each operating scenario:

- (1) A description of the process and the type of process equipment used;
- (2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;
- (3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;
- (4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;
- (5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);
- (6) The applicable monitoring requirements and any parametric level that assures compliance for all emissions

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- routed to the control device or treatment process;
- (7) Calculations and engineering analyses required to demonstrate compliance; and
- (8) For reporting purposes, a change to any of these elements not previously reported, except for item (5) above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 305: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 305.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00023

Emission Point: 112A1

Process: H06

Emission Source: 112AC

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 305.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with the 0.050 grains/dscf particulate standard, the pressure drop across Control Device 11203 (CAMFILL FARR Dust Collector) shall be monitored weekly during normal, steady state operation and maintained between 1.0 and 5.0 inches of water.

Records of the pressure drop shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 1.0 inches of water

Upper Permit Limit: 5.0 inches of water

Reference Test Method: Method 5

Monitoring Frequency: WEEKLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-57: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-57.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

**Item 1-57.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission Unit U-00024 includes emission sources which are permitted under more than one operating scenario. These operating scenarios are defined by Processes E55 and E56. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-58: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 1-58.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00024

Emission Point: 317X1

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Emission Unit: U-00024	Emission Point: 317X3
Emission Unit: U-00024	Emission Point: 317X5
Emission Unit: U-00024	Emission Point: 317X7
Emission Unit: U-00024 Process: E52	Emission Point: 317R6 Emission Source: 317CH
Emission Unit: U-00024 Process: E52	Emission Point: 317R7 Emission Source: 317CI
Emission Unit: U-00024 Process: E52	Emission Point: 317T9 Emission Source: 317CT
Emission Unit: U-00024 Process: E52	Emission Point: 317S1 Emission Source: 317DQ
Emission Unit: U-00024 Process: E52	Emission Point: 317W2 Emission Source: 317EB
Emission Unit: U-00024 Process: E52	Emission Point: 317W4 Emission Source: 317EC
Emission Unit: U-00024 Process: E52	Emission Point: 317Y3 Emission Source: 317GF
Emission Unit: U-00024 Process: E52	Emission Point: 317Y5 Emission Source: 317GH
Emission Unit: U-00024 Process: E52	Emission Point: 317Y7 Emission Source: 317GK
Emission Unit: U-00024 Process: E52	Emission Point: 317Z2 Emission Source: 317GQ
Emission Unit: U-00024 Process: E52	Emission Point: 317Z3 Emission Source: 317GR
Emission Unit: U-00024 Process: E52	Emission Point: 317Z4 Emission Source: 317GS
Emission Unit: U-00024 Process: E52	Emission Point: 317Z5 Emission Source: 317GT
Emission Unit: U-00024 Process: E52	Emission Point: 317Z6 Emission Source: 317GU
Emission Unit: U-00024 Process: E52	Emission Point: 317Z8 Emission Source: 317GW
Emission Unit: U-00024	Emission Point: 317Z9

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Process: E52	Emission Source: 317GX
Emission Unit: U-00024 Process: E52	Emission Point: 317I1 Emission Source: 317HU
Emission Unit: U-00024 Process: E52	Emission Point: 317I2 Emission Source: 317JD
Emission Unit: U-00024 Process: E52	Emission Point: 33501 Emission Source: 335AA
Emission Unit: U-00024 Process: E52	Emission Point: 33502 Emission Source: 335AA

**Item 1-58.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 308: Applicability of General Provisions of 40 CFR 60 Subpart A Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 60, NSPS Subpart A**

**Item 308.1:**

This Condition applies to Emission Unit: U-00024

**Item 308.2:**

This emission source is subject to the applicable general provisions of 40 CFR 60. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

**Condition 1-59: Compliance Certification Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Replaces Condition(s) 326, 327**

**Item 1-59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024  
Process: E52

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-59.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:





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In order to maintain compliance with the 0.050 grains/dscf particulate standard, the pressure drop across the pleated filters identified below shall be monitored weekly during normal, steady state operation and maintained between 0.10 and 1.0 inches of water.

Control Device 31792 (West Sub Room pleated filter on Fan OO, Emission Point 317E7)

Control Device 31793 (West Sub Room pleated filter on Fan MM, Emission Point 317F0)

Records of the pressure drop shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 0.10 inches of water

Upper Permit Limit: 1.0 inches of water

Monitoring Frequency: WEEKLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-60: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Replaces Condition(s) 311**

**Item 1-60.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E52

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-60.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with the 0.050 grains/dscf particulate standard, the pressure drop across the bag filters identified below shall be monitored weekly during normal, steady-state operation and maintained between 0.4 and 6 inches of water.

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Control Device ID 31745  
Control Device ID 31764

Records of the pressure drop shall be kept onsite and made available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE  
Lower Permit Limit: 0.4 inches of water  
Upper Permit Limit: 6 inches of water  
Monitoring Frequency: WEEKLY  
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-61: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Replaces Condition(s) 309**

**Item 1-61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024  
Process: E52

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-61.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with the 0.050 grains/dscf particulate standard, the catch drums identified below shall be inspected monthly. The drums shall be emptied if they are more than 50% full.

Control Device ID 31769  
Control Device ID 31771  
Control Device ID 31773  
Control Device ID 31776  
Control Device ID 31778  
Control Device ID 31780

Records of the inspections shall be kept onsite and made

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available to the Department upon request.

Monitoring Frequency: MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 310: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 310.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024  
Process: E52

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 310.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with the 0.050 grains/dscf particulate standard, the pressure drop across the bag filters identified below shall be monitored weekly during normal, steady-state operation and maintained between 0.1 and 6 inches of water.

Control Device ID 31765  
Control Device ID 31783

Records of the pressure drop shall be kept onsite and made available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE  
Lower Permit Limit: 0.1 inches of water  
Upper Permit Limit: 6 inches of water  
Monitoring Frequency: WEEKLY  
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 312: Compliance Certification**



Effective between the dates of 01/01/2012 and 12/31/2016

Applicable Federal Requirement:6 NYCRR 212.6 (a)

**Item 312.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E52

**Item 312.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-62: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-62.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E55

**Item 1-62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition,

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it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-63: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024  
Process: E55

**Item 1-63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

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

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(e) not use open containers to store or dispose of spent surface

coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and

VOC solvents; and

(g) clean hand held spray guns by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when

not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

- date and time of observation

- description of observed deviation from this permit condition

- corrective measures taken, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-64: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (3)**

**Item 1-64.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E55

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-64.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings applied to paper film and foil may not use coatings with VOC contents, as applied, which exceed 0.08 kgVOC/kg coating (or 0.08 lbVOC/lb coating).

In accordance with 6 NYCRR 228-1.3(b)(1), the following records must be maintained and, upon request, provided to the Department:

1. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating,
2. Purchase, usage, and/or production records of the coating material including solvents.
3. Any other parameters used to verify compliance.

These records shall be updated prior to running any formulation changes in production.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 pounds of VOC per pound of coating

Reference Test Method: Method 24 ( or other approved method)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-65: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 227-2.4**

**Replaces Condition(s) 639**

**Item 1-65.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E63

Emission Source: 351AP

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-65.2:**

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain the "Small Boiler" classification under Part 227-2 for the Hot Oil Heater (ES 351AP), 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. Kodak shall not change the linkage between the natural gas valve and the air curtain valve at any time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-66: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 227-2.4 (d)**

**Replaces Condition(s) 640**

**Item 1-66.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E63

Emission Source: 351AP

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-66.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a small boiler, small combustion turbine, or small internal combustion engine must perform an annual tune-up of their equipment and maintain, in a permanently bound log book, or other format approved in writing by the department, the following information:

- (1) the date of the last tune-up;
- (2) the name, title, and affiliation of the person who made the adjustments; and
- (3) any other information that the department may require.

Records of each tune-up must be kept on-site for a minimum of five years.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 324: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 60.48c(g), NSPS Subpart Dc**

**Item 324.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E63

Emission Source: 351AP

**Item 324.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 325: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 60.48c(i), NSPS Subpart Dc**

**Item 325.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Process: E63

Emission Source: 351AP

**Item 325.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required under this section shall be

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maintained by the owner or operator of the affected facility for a period of two years following the date of such record, for determining compliance with the NSPS requirements.

**\*\* NOTE\*\*** Records shall be maintained for a minimum of five years to achieve compliance with the requirements of Title V.

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 12 calendar month(s).

**Condition 332: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 332.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024                      Emission Point: 317W3  
Process: E52                                      Emission Source: 317DL

Regulated Contaminant(s):  
CAS No: 0NY075-00-0      PARTICULATES

**Item 332.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c), emissions from Emission Source 317DL shall be controlled with the Cyclone/Baghouse Dust Collector (Control Device 31794). The control device will be equipped and operated with a high level alarm in the control room. If an alarm is received, the process shall be shut down to empty the dust hopper before resuming operation.

If a leak is detected by visual inspection, the source will be shut down and necessary repairs shall be made before resuming operation.

Emission Control 31794 shall be maintained per manufacturers recommendations.

Records of alarms, inspection results, and filter replacements shall be maintained on site and made

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available to the Department upon request.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 333: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 333.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Emission Point: 317X5

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 333.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, annual emissions of Volatile Organic Compounds (VOC) from Emission Point 317X5 shall not exceed 66.3 tpy, on a rolling 12-month basis.

The sum of VOC emissions from the 305 Machine coating and cleaning operations shall be recorded each month. Emission calculations shall be based upon (1) records reflecting the total monthly quantity (lbs) of VOCs contained in coating materials which were delivered to 305 Machine, and (2) records reflecting the total monthly quantity of VOCs used for cleaning.

Monthly emissions shall be calculated as follows:

Monthly emissions of VOCs = A+B

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where,

A= Total quantity of VOCs contained in coating materials which were delivered to 305 Machine during month

B= Total quantity of VOC's which was used for cleaning 305 Machine during month

Records shall be retained for 5 years.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 66.3 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-67: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 231-2.2 (d) (3)**

**Replaces Condition(s) 334**

**Item 1-67.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Emission Point: 317X7

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-67.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, annual emissions of Volatile Organic Compounds (VOC) from Emission Point 317X7 shall not exceed 39.0 tpy, on a rolling 12-month basis.

The sum of VOC emissions from 307 Machine coating and cleaning operations shall be recorded each month. Emission calculations shall be based on 1) records reflecting the total monthly quantity (lbs) of VOCs contained in coating materials which were delivered to 307 Machine, and 2) records reflecting the total monthly quantity of VOCs used for cleaning.

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Monthly emissions shall be calculated as follows:

Monthly emissions of VOCs = A+B

where,

A= Total quantity of VOCs contained in coating materials which were delivered to 307 Machine during the month

B= Total quantity of VOCs which was used for cleaning 307 Machine during the month

Records shall be retained on site for five years and made available for Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 39.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 335: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 227-1.3 (a)**

**Item 335.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00024

Emission Point: 351C8

Process: E63

Emission Source: 351AP

**Item 335.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute block period per hour of not more than 27 percent opacity.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. The stationary combustion installation subject to this condition shall be fired only with natural gas.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

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Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 336: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 233.3**

**Item 336.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 336.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233 control requirements in paragraphs 233.3(a), (b), (e) and (f) for manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park as follows:

(i) Kodak shall develop an Emission Rate Potential (ERP) for Volatile Organic Compounds (VOCs) for each reactor, extractor, distillation operation, crystallizer, centrifuge, vacuum dryer, air dryer, and production exhaust system that will be used to manufacture pharmaceutical or cosmetic products.

(ii) Kodak shall not use any reactor, extractor, distillation operation, crystallizer, centrifuge or vacuum dryer that has an ERP for VOCs greater than 15 pounds per day to manufacture pharmaceutical or cosmetic products.

(iii) Kodak shall not perform any pharmaceutical or cosmetic manufacturing processes which use any combination of air dryers and production exhaust systems with a total ERP for VOCs greater than 33 pounds per day.

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(iv) All centrifuges containing volatile organic compounds, rotary vacuum filters processing volatile organic compounds and any other filters having an exposed liquid surface where the liquid contains volatile organic compounds having an exposed liquid surface and exerts a total vapor pressure of 0.5 psi or more at 20° C must be enclosed unless production, sampling, maintenance, or inspection procedures require operator access.

(v) For all in-process tanks containing a volatile organic compound, covers must be installed on openings to these tanks. Tank openings must remain covered unless production, sampling, maintenance, or inspection procedures require operator access.

(vi) Kodak shall keep records of all ERP determinations and process write-ups documenting all equipment which is used in each pharmaceutical and cosmetic manufacturing process.

(vii) Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 337: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 233.3 (g)**

**Item 337.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 337.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233



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leak requirements for manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park as follows:

(i) For all air dryers and production exhaust systems used in any pharmaceutical or cosmetic manufacturing process, Kodak must repair all leaks from which a liquid containing volatile organic compounds can be observed running or dripping the first time the equipment is off-line for a period of time

long enough to complete the repair, but not later than 15 days after the leak is discovered. If the leaking component cannot be repaired while being used on pharmaceutical or cosmetic manufacturing processes until the process is shut down, and a shut down cannot be done within the 15 days after the leak is detected, the leaking component must then be repaired before the process is restarted.

(ii) Kodak shall keep records of all process write-ups documenting all air dryers and production exhaust systems which are used in each pharmaceutical and cosmetic manufacturing process.

(iii) Kodak shall keep the following records for any leak on air dryers and production exhaust systems described above which cannot be readily repaired within one day after detection:

- (1) the name of the leaking equipment;
- (2) the date and time the leak is detected;
- (3) the action taken to repair the leak; and
- (4) the date and time the leak is repaired.

(iv) Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 338: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2460(b), Subpart FFFF**

**Item 338.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

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Regulated Contaminant(s):  
CAS No: ONY100-00-0 TOTAL HAP

**Item 338.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to satisfy the requirements for processes with batch process vents, Kodak must determine the group status of the batch process vents by determining and summing the uncontrolled organic HAP emissions from each of the batch process vents within the process using the SynChem MON MACT Estimating Model, based on the procedures specified in §63.1257(d)(2)(i) and (ii), except as specified in paragraphs 2460(b)(1) through (7).

In order to meet the requirements of paragraph 63.2460(b)(4) for vessels equipped with a process condenser, Kodak must calculate the uncontrolled emissions by using the SynChem MON MACT Estimating Model as follows:

- (i) Kodak must determine the flowrate of gas (or volume of gas), partial pressures of condensables, temperature (T), and HAP molecular weight (MW HAP) at the exit temperature and exit pressure conditions of the condenser or at the conditions of the dedicated receiver.
- (ii) Kodak must assume that all of the components contained in the condenser exit vent stream are in equilibrium with the same components in the exit condensate stream (except for noncondensables).
- (iii) Kodak must perform a material balance for each component.
- (iv) Emissions from empty vessel purging shall be calculated using the exit temperature and exit pressure conditions of the condenser or the conditions of the dedicated receiver.
- (v) Kodak must conduct an engineering assessment for each emission episode that is not due to vapor displacement, purging, heating, depressurization, vacuum operations, gas evolution, air drying, or empty vessel purging.
- (vi) Kodak may elect to conduct an engineering assessment if it can demonstrate to the EPA that the MON MACT methods are not appropriate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

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**Condition 339: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.2465(b), Subpart FFFF**

**Item 339.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

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

**Item 339.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If any process vents within a process emit hydrogen halide and halogen HAP, Kodak must determine and sum the uncontrolled hydrogen halide and halogen HAP emissions from each of the process vents within the process using the SynChem MON MACT Estimating Model in accordance with the procedures specified in §63.1257(d)(2)(i) and/or (ii), as appropriate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-68: Compliance Certification**  
Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Replaces Condition(s) 342**

**Item 1-68.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

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

**Item 1-68.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

Leak detection procedures for agitator seals shall be conducted in accordance with the requirements of §63.1028(c) of Subpart UU, as follows:

a) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, Kodak shall monitor each agitator seal monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 parts per million or greater.

b) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, each agitator seal shall be checked by visual inspection each calendar week for indications of liquids dripping from the agitator seal. Kodak shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the agitator seal at the time of the weekly inspection, prior to the next required inspection Kodak shall:

(1) Monitor the agitator seal using Method 21. If an instrument reading of 10,000 parts per million or greater is measured, a leak is detected and it shall be repaired;

or

(2) Eliminate the indications of liquids dripping from the agitator seal.

c) The following agitators are exempt from these monthly monitoring requirements:

(1) Any agitator that is designed with no externally actuated shaft penetrating the agitator housing.

(2) Any agitator that is routed to a process system that captures and transports leakage from the agitator to a control device.

(3) Any agitator seal that is designated as difficult-to-monitor and Kodak monitors the agitator seal according to a written plan.

(4) Any agitator seal that is obstructed by equipment or piping that prevents access to the agitator by a monitor probe.

(5) Any agitator seal that is designated as unsafe-to-monitor and Kodak monitors the agitator seal according to a written plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

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**Condition 340: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 340.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

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

**Item 340.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak Detection and Repair (LDAR) monitoring for open-ended valves or lines shall be conducted in accordance with §63.1033(a) of Subpart UU.

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply at all other times.

Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from these requirements.

Open-ended valves or lines containing materials that would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system are also exempt from these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

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**Condition 341: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 341.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 341.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for pumps shall be conducted in accordance with the requirements of §63.1026 of Subpart UU.

(a) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. Kodak shall document that the inspection was conducted and the date of the inspection.

If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, Kodak shall:

- (1) Monitor the pump using Method 21. If the instrument reading indicates a leak, a leak is detected and it shall be repaired; or
- (2) Kodak shall eliminate the visual indications of liquids dripping.

(b) Kodak shall monitor each pump monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 ppmv for batch process pumps.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 343: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016



**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 343.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 343.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall monitor each valve at the intervals described below to detect leaks by Method 21. The instrument reading that defines a leak is 500 parts per million or greater for all valves in gas and vapor service and in light liquid service.

In accordance with §63.1025(b) of Subpart UU, Kodak shall monitor valves for leaks at the following intervals:

- (1) If at least the greater of 2 valves or 2 percent of the valves in a process unit leak Kodak shall monitor each valve once per month.
- (2) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, Kodak shall monitor each valve once each quarter. Monitoring data generated before the regulated source became subject to the MON MACT may be used to qualify initially for less frequent monitoring.
- (3) At process units with less than 1 percent leaking valves, Kodak may elect to monitor each valve once every two quarters.
- (4) At process units with less than 0.5 percent leaking valves, Kodak may elect to monitor each valve once every four quarters.
- (5) At process units with less than 0.25 percent leaking valves, Kodak may elect to monitor each valve once every 2 years.

Kodak shall keep a record of the monitoring schedule for each process unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.



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

**Condition 344: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 344.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 344.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to leak repair schedules and record keeping in accordance with the requirements of §63.1024 of Subpart UU.

Each leak detected shall be repaired as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

For each leak detected, the following information shall be recorded and maintained for 5 years beyond the date of the last use of the equipment:

- (1) The date of first attempt to repair the leak.
- (2) The date of successful repair of the leak.
- (3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak if Kodak has developed a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan or may



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be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.

(5) Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 345: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 345.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 345.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to the requirements for identifying leaking equipment specified at §63.1023 of Subpart UU. When each equipment leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. The leak identification on a valve may be removed after it has been repaired and the valve has been monitored by Method 21 at least once within the first 3 months after its repair and no leak has been detected during that monitoring. The identification on pumps, agitators and connectors may be removed after it is repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 346: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 346.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

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

**Item 346.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Written plans for equipment monitoring, in accordance with the requirements of §63.1022(c)(4) in Subpart UU, shall be kept on site.

Kodak shall have a written plan that requires monitoring of equipment designated as unsafe-to-monitor as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment if a leak is detected.

Kodak shall have a written plan that requires monitoring of the equipment designated as difficult-to-monitor at least once per calendar year and repair of the equipment if a leak is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 347: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 347.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

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Regulated Contaminant(s):  
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**Item 347.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.1022(b)(5) of Subpart UU, the identity, either by list, location (area or group), or other method, of equipment in regulated material service less than 300 hours per calendar year within a process unit or affected facilities subject to the MON MACT shall be recorded.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 348: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 348.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

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

**Item 348.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Equipment subject to the MON MACT shall be identified according to the requirements specified at §63.1022 in Subpart UU. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods. Note: Equipment includes - pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors,

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instrumentation systems, and closed vent systems and control devices used to meet the MON MACT requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 349: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 349.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 349.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Wastewaters subject to the MON MACT requirements for wastewater maintenance procedures according the applicability identified in Table 7 of Subpart FFFF, must be compliant with Subpart F, 63.105(b) and (c).

Kodak shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance).

The descriptions shall:

- (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;
- (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- (3) Specify the procedures to be followed when clearing materials from process equipment.

Kodak shall modify and update the information in the SCD

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maintenance wastewater plan (SCD SOP-0152) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 350: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 350.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 350.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.147 of Subpart G for wastewater record keeping.

Kodak shall keep in a readily accessible location the following records for all Group 2 wastewater streams:

- (1) Process unit identification and description of the process unit;
- (2) Stream identification code;
- (3) For existing sources, concentration of Table 9 compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration; and
- (4) Flow rate in liter per minute.

If Kodak uses process knowledge to determine the annual average concentration of a wastewater stream and/or uses process knowledge to determine the annual average flow rate, and determines that the wastewater stream is not a Group 1 wastewater stream, Kodak shall keep in a readily

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accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 351: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 351.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 351.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.136 of Subpart G for wastewater drain systems.

Each individual drain system that receives or manages a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream shall be inspected initially, and semi- annually thereafter, for improper work practices and control equipment failures. For individual drain systems, improper work practice includes, but is not limited to, leaving open any access hatch or other opening when such hatch or opening is not in use for sampling or removal, or for equipment inspection, maintenance, or repair.

For individual drain systems, control equipment failure includes, but is not limited to, any time a joint, lid, cover, or door has a gap or crack, or is broken. When an improper work practice or a control equipment failure is identified, first efforts at repair shall be made no later than 5 calendar days after identification and repair shall be completed within 15 calendar days after

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identification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 353: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485(j), Subpart FFFF**

**Item 353.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 353.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak must determine the annual average concentration and annual average flow rate for wastewater streams for each MCPU. The procedures for flexible operation units do not apply for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 354: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 354.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP



**Item 354.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water LDAR leak repair according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(d).

If a leak is detected, Kodak shall comply with the following requirements:

- (1) The leak shall be repaired as soon as practical but not later than 45 calendar days after Kodak receives results of monitoring tests indicating a leak. The leak shall be repaired unless Kodak demonstrates that the results are due to a condition other than a leak.
- (2) Once the leak has been repaired, Kodak shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown. All time periods shall be determined from the date when Kodak determines that delay of repair is necessary. If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.

If a shutdown is not expected within the next 2 months documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as practical. If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, Kodak may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. Kodak shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as follows:

- (1) Calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. Kodak may calculate potential emissions using total organic carbon concentration instead of total hazardous



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air pollutants listed in Table 4; and  
(2) Determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

If repair is delayed for any other reasons, Kodak may delay repair up to a maximum of 120 calendar days. Kodak shall demonstrate that the necessary parts or personnel were not available.

Kodak shall retain the following records:

- (1) Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
- (2) Records of any leaks detected and the date the leak was discovered;
- (3) The dates of efforts to repair leaks; and
- (4) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

If Kodak invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported:

- (1) The presence of the leak and the date that the leak was detected;
- (2) Whether or not the leak has been repaired;
- (3) The reason(s) for delay of repair. If delay of repair is invoked because repair would cause greater emissions than the potential emissions from delaying repair, documentation of emissions estimates must also be submitted;
- (4) If the leak remains unrepaired, report the expected date of repair; and
- (5) If the leak is repaired, report the date the leak was successfully repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 355: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2490, Subpart FFFF**



**Item 355.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 355.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water Leak Detection and Repair (LDAR) monitoring according the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(a),(b) or (c).

For process condensers with cooling water, Kodak has elected to comply with 63.104(a) by operating each condenser with a minimum pressure on the cooling water side at least 35 kilopascals (5.1 psi) greater than the maximum pressure on the process side.

For reactor jackets with cooling water, Kodak has elected to comply with 63.104(c) by monitoring a surrogate indicator of heat exchange system leaks. Kodak shall:

(1) prepare and implement a monitoring plan (SCD SOP - 2444) that documents the procedures that will be used to detect leaks of process fluids from reactors into cooling water in the reactor jacket. The plans includes:

(i) A description of the parameter or condition to be monitored and an explanation of how the selected parameter or condition will reliably indicate the presence of a leak.

(ii) The parameter level(s) or conditions(s) that shall constitute a leak. This shall be documented by data or calculations showing that the selected levels or conditions will reliably identify leaks. The monitoring must be sufficiently sensitive to determine the range of parameter levels or conditions when the system is not leaking. When the selected parameter level or condition is outside that range, a leak is indicated.

(iii) The monitoring frequency which shall be no less frequent than monthly for the first 6 months and quarterly thereafter to detect leaks.

(iv) The records that will be maintained to document

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compliance with the requirements of this section.

(2) If a substantial leak is identified by methods other than those described in the monitoring plan and the method(s) specified in the plan could not detect the leak, the owner or operator shall revise the plan and document the basis for the changes. The owner or operator shall complete the revisions to the plan no later than 180 days after discovery of the leak.

(3) The owner or operator shall maintain, at all times, the monitoring plan that is currently in use. The current plan shall be maintained on-site, or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. If the monitoring plan is superseded, the owner or operator shall retain the most recent superseded plan at least until 5 years from the date of its creation. The superseded plan shall be retained on-site (or accessible from a central location by computer or other means that provides access within two hours after a request) for at least 6 months after its creation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 356: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2525, Subpart FFFF**

**Item 356.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 356.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 40 CFR 63.2525(f), Kodak must keep a record of each time a safety device (e.g. a pressure relief valve, rupture disc, fusible plug, or any other type of device which functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors

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directly to the atmosphere ) is opened to avoid unsafe conditions during the manufacture of a MON covered process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 357: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 357.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 357.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(e), Kodak shall keep records for Group 2 Batch Process Vents as follows:

For Low Volume Group 2 processes with < 10,000 lb/yr OHAP usage Kodak must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the third paragraph below. After 1 year, Kodak may revert to recording only usage if the usage during the year is less than 10,000 lb.

For Mid Volume Group 2 processes with < 1,000 lb/yr OHAP emissions Kodak must keep records of the number of batches operated and calculate a daily rolling annual sum of batches operated no less frequently than monthly. If the number of batches operated results in organic HAP emissions that exceed 1,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a

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standard batch, and Kodak must begin recordkeeping as specified in the paragraph below. After 1 year, Kodak may revert to recording only the number of batches if the number of batches operated during the year results in less than 1,000 lb of organic HAP emissions.

For High Volume Group 2 processes with > 1,000 lb/yr OHAP emissions Kodak must keep the following records:

- (i) A record of the day each batch was completed and/or the operating hours per day for continuous operations with hydrogen halide and halogen emissions;
- (ii) A record of whether each batch operated was considered a standard batch;
- (iii) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch; and
- (iv) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 358: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2525, Subpart FFFF**

**Item 358.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

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**Item 358.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c), Kodak must maintain a schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 359: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 359.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 359.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each operating scenario:

- (1) A description of the process and the type of process equipment used;
- (2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;
- (3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;
- (4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;
- (5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);
- (6) The applicable monitoring requirements and any parametric level that assures compliance for all emissions routed to the control device or treatment process;
- (7) Calculations and engineering analyses required to demonstrate compliance; and
- (8) For reporting purposes, a change to any of these elements not previously reported, except for item (5)

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above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 360: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 360.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00025

Process: S05

**Item 360.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not

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limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 361: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 361.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00025  
Process: S05

**Item 361.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

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

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





there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-69: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Replaces Condition(s) 362**

**Item 1-69.1:**

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

Emission Unit: U-00032	Emission Point: 326B7
Emission Unit: U-00032	Emission Point: 326C2
Emission Unit: U-00032 Process: P93	Emission Point: 326C3 Emission Source: 326BG
Emission Unit: U-00032 Process: P93	Emission Point: 326C4 Emission Source: 326BH

**Item 1-69.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

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**Condition 1-70: Compliance Certification**  
Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Replaces Condition(s) 363**

**Item 1-70.1:**

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

Emission Unit: U-00032	Emission Point: 326B7
Emission Unit: U-00032	Emission Point: 326C2
Emission Unit: U-00032	Emission Point: 326C3
Emission Unit: U-00032	Emission Point: 326C4

**Item 1-70.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department

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determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-71: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-71.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00047  
Process: P61

**Item 1-71.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree

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of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-72: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-72.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00047  
Process: P61

**Item 1-72.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this

Subpart must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC

solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling,



maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface

coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and

VOC solvents; and

(g) clean hand held spray guns by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when

not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-73: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-73.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00047  
Process: P61

Regulated Contaminant(s):  
CAS No: 0NY998-00-0    VOC

**Item 1-73.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In accordance with 6 NYCRR 228-1.5(d)(1), Kodak shall use an approved coating system approach for Subpart 228-1 compliance 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. Based on the "Request for Approval of a Coating System", submitted by Kodak on January 16, 2014, coatings as applied to film substrates may not exceed a VOC content of 2.9 lb VOC/ gallon of coating (minus water and excluded compounds).

In accordance with 6 NYCRR 228-1.3(b)(1), the following records must be maintained and, upon request, provided to the Department:

1. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating,
2. Purchase, usage, and/or production records of the coating material including solvents.
3. Any other parameters used to verify compliance.

These records shall be updated prior to running any formulation changes in production.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 ( or other approved method)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-74: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**



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

**Item 1-74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00047

Process: P61

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 1-74.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a coating line which utilizes a coating system as a control strategy (which may also employ a control device) must comply with the following provisions:

(1) the coating system must be approved by the Department prior to the use of the coating system in the manufacture of a product for sale;

(2) coatings which are applied manually by handheld spray guns cannot be utilized in a coating system;

(3) the emission differential (ED) for a coating system must be determined using the formula in 6 NYCRR Part 228-1.5(d). The ED for the coating system is the sum of the individual ED values calculated for every coating used in the coating system. The ED calculation requirement is to be performed each time the series of coatings in a coating system is changed. The coating system ED must be less than or equal to zero before the coating system may be operated;

(4) the ED figures for the individual coating used in the coating system must be calculated on an instantaneous basis. There is no averaging period for individual coatings which are part of a coating system;

(5) the method or instrument by which the owner or operator will measure or calculate the volume of coating applied must be approved by the Department; and

(6) In order to comply with 6 NYCRR 228-1.6(g), for each ED calculation performed, the owner or operator of the coating system must record the following and make records available to the Department upon request:



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- (i) the name or identification of each coating;
- (ii) the coating parameters used to determine the ED value (Equation 7);
- (iii) the individual ED values for each coating; and
- (iv) the ED value calculated for the coating system.

(7) Any information or record showing noncompliance with these requirements must be reported the Department within 30 days following notice or generation of the information or record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-75: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)**

**Replaces Condition(s) 371**

**Item 1-75.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00047

Emission Point: 03810

Process: P65

Emission Source: 038AB

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 1-75.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with VOC RACT requirements for the process kettles, as determined in the RACT evaluation dated March, 2012, the total VOC emissions shall not exceed 0.47 tpy on a rolling twelve month basis.

Additionally, the peak hourly emission rate is limited to 7.9 pounds per hour. Emissions of VOCs shall be calculated on a monthly basis, recording the number of batches and VOCs emitted per batch (using conservative emission factors).

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Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be reevaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next reevaluation shall be submitted no later than March 1, 2017.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-76: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)**

**Replaces Condition(s) 372**

**Item 1-76.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00047                      Emission Point: 03816  
Process: P65                                      Emission Source: 038AG

Regulated Contaminant(s):  
CAS No: 0NY998-00-0      VOC

**Item 1-76.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with VOC RACT requirements for the belt chillers, as determined in the RACT evaluation dated March 2012, the total VOC emissions shall not exceed 2.0 tpy on a rolling twelve month basis. Additionally, the peak hourly emission rate is limited to 20.72 pounds per hour. Emissions of VOCs shall be calculated on a monthly basis, recording the number of batches and VOCs emitted per batch (using conservative emission factors).

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be reevaluated every five years, or prior to any changes that could



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significantly impact the existing approved or pending RACT evaluation. The next reevaluation shall be submitted no later than March 1, 2017.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 373: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 373.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00047                      Emission Point: 03818

Regulated Contaminant(s):  
CAS No: 0NY998-00-0      VOC

**Item 373.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, the aggregate annual emissions of VOCs from this source shall not exceed 65.8 tons per year (tpy) on a rolling twelve-month basis. Emissions of VOCs shall be calculated on a monthly basis from material usage and production records and incorporated into a rolling twelve-month total, expressed in tpy. These records shall be retained on site for five years and made available to the Department upon request.

Parameter Monitored: VOC  
Upper Permit Limit: 65.8 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 401: Compliance Certification**



Effective between the dates of 01/01/2012 and 12/31/2016

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

**Item 401.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00053 Process: I35	Emission Point: 325X3 Emission Source: 325AM
Emission Unit: U-00053 Process: I35	Emission Point: 325X3 Emission Source: 325AP
Emission Unit: U-00053 Process: I35	Emission Point: 325X3 Emission Source: 325AS
Emission Unit: U-00053 Process: I35	Emission Point: 325X3 Emission Source: 325AT

**Item 401.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not

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limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 402: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 402.1:**  
The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00053  
Process: I35

**Item 402.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee

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will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 403: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 233.3**

**Item 403.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 403.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233(e) and (f) control requirements for manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park as

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follows:

(i) All centrifuges containing volatile organic compounds, rotary vacuum filters processing volatile organic compounds and any other filters having an exposed liquid surface where the liquid contains volatile organic compounds having an exposed liquid surface and exerts a total vapor pressure of 0.5 psi or more at 20° C must be enclosed unless production, sampling, maintenance, or inspection procedures require operator access.

(ii) For all in-process tanks containing a volatile organic compound, covers must be installed on openings to these tanks. Tank openings must remain covered unless production, sampling, maintenance, or inspection procedures require operator access.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 404: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 233.3 (g)**

**Item 404.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 404.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233 leak requirements for manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park as follows:

(i) For all equipment used in any pharmaceutical or



cosmetic manufacturing process, Kodak must repair all leaks from which a liquid containing volatile organic compounds can be observed running or dripping the first time the equipment is off-line for a period of time long enough to complete the repair, but not later than 15 days after the leak is discovered. If the leaking component cannot be repaired while being used on pharmaceutical or cosmetic manufacturing processes until the process is shut down, and a shut down cannot be done within the 15 days after the leak is detected, the leaking component must then be repaired before the process is restarted.

(ii) Kodak shall keep records of all equipment which is used in each pharmaceutical and cosmetic manufacturing process.

(iii) Kodak shall keep the following records for any leak on air dryers and production exhaust systems described above which cannot be readily repaired within one day after detection:

- (1) the name of the leaking equipment;
- (2) the date and time the leak is detected;
- (3) the action taken to repair the leak; and
- (4) the date and time the leak is repaired.

(iv) Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-77: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 233.3 (h) (1)**

**Replaces Condition(s) 405**

**Item 1-77.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-77.2:**

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6NYCRR Part 233.3 (a) and (b) control requirements while manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park:

(i) Kodak shall operate surface condensers on reactors, extractors, distillation operations, crystallizers, centrifuges and vacuum dryers in Emission Unit U-00053 as follows:

Equipment with surface condensers using chilled water as a coolant (identified below), shall operate with a maximum condenser coolant temperature of 10 degrees C.

Vessel 291

Vessel 701

Vessel 801

Vessel 1331

Vessel 1731

Vessel 1761

Vessel 1791

Guedu Dryer

Wiped Film Evaporator

Edwards Vacuum Pump

All other equipment using Kodak water as a coolant shall operate with a maximum condenser coolant temperature of 25 degrees C.

(ii) If the operation of a condenser at the condenser coolant temperature specified above results in freezing and consequent plugging of the condenser, the allowable condenser coolant temperature may be raised to a maximum of 2° C above the freezing point of the volatile organic compound.

(iii) Kodak shall document the equipment with surface condensers being used and the condenser coolant temperature prior to the start of each production batch.

(iv) As determined in the 6NYCRR Part 212 VOC RACT evaluation dated September 2013, the aggregate VOC emissions from both Part 212 sources and air dryers and production equipment exhaust systems subject to Part 233 from Emission Point 325X3 shall not exceed 66 tpy (tons per year) on a rolling twelve-month basis.

(v) Records shall be maintained of the quantity of each pharmaceutical and cosmetic product manufactured



(synthesized by chemical reaction), by identification number. The records shall be updated monthly and compiled into a 12 month rolling total. The methods of calculation shall be those described in Mass Balance Calculation Techniques for the Synthetic Chemicals Division (Copyright ©) by Eastman Kodak Company, 1991.

(vi) All of the pharmaceutical and cosmetic production during any given 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions shall be calculated by multiplying the number of batches of each pharmaceutical and cosmetic product made in that month by the calculated VOC emissions per batch.

(vii) Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next reevaluation shall be submitted no later than September 30, 2018.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 406: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 406.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 406.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to Start-up, Shutdown, and Malfunction Record Keeping requirements specified under §63.998(d)(3) of Subpart SS. Kodak shall maintain records of the



occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment used to comply with the MON MACT during which excess emissions occur. For each start-up, shutdown, and malfunction during which excess emissions occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing control device emissions to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-78: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Replaces Condition(s) 407**

**Item 1-78.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-78.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for agitator seals shall be conducted in accordance with the requirements of §63.1028(c) of Subpart UU, as follows:



a) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, Kodak shall monitor each agitator seal monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 parts per million or greater.

b) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, each agitator seal shall be checked by visual inspection each calendar week for indications of liquids dripping from the agitator seal. Kodak shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the agitator seal at the time of the weekly inspection, prior to the next required inspection Kodak shall:

- 1) Monitor the agitator seal using Method 21. If an instrument reading of 10,000 parts per million or greater is measured, a leak is detected and it shall be repaired;
- or
- 2) Eliminate the indications of liquids dripping from the agitator seal.

The following agitators are exempt from these monthly monitoring requirements:

- (1) Any agitator that is designed with no externally actuated shaft penetrating the agitator housing.
- (2) Any agitator that is routed to a process system that captures and transports leakage from the agitator to a control device.
- (3) Any agitator seal that is designated as difficult-to-monitor and Kodak monitors the agitator seal according to a written plan.
- (4) Any agitator seal that is obstructed by equipment or piping that prevents access to the agitator by a monitor probe.
- (5) Any agitator seal that is designated as unsafe-to-monitor and Kodak monitors the agitator seal according to a written plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 408: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

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**Item 408.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 408.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak Detection and Repair (LDAR) monitoring for open-ended valves or lines shall be conducted in accordance with §63.1033(a) of Subpart UU.

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply at all other times.

Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from these requirements.

Open-ended valves or lines containing materials that would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system are also exempt from these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 409: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 409.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 409.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for pumps shall be conducted in accordance with the requirements of §63.1026 of Subpart UU.

(a) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. Kodak shall document that the inspection was conducted and the date of the inspection.

If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, Kodak shall:

(1) Monitor the pump using Method 21. If the instrument reading indicates a leak, a leak is detected and it shall be repaired; or

(2) Kodak shall eliminate the visual indications of liquids dripping.

(b) Kodak shall monitor each pump monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 ppmv for batch process pumps.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 410: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 410.1:**

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 410.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall monitor each valve at the intervals described below to detect leaks by Method 21. The instrument reading that defines a leak is 500 parts per million or greater for all valves in gas and vapor service and in light liquid service.

In accordance with §63.1025(b) of Subpart UU, Kodak shall monitor valves for leaks at the following intervals:

- (1) If at least the greater of 2 valves or 2 percent of the valves in a process unit leak Kodak shall monitor each valve once per month.
- (2) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, Kodak shall monitor each valve once each quarter. Monitoring data generated before the regulated source became subject to the MON MACT may be used to qualify initially for less frequent monitoring.
- (3) At process units with less than 1 percent leaking valves, Kodak may elect to monitor each valve once every two quarters.
- (4) At process units with less than 0.5 percent leaking valves, Kodak may elect to monitor each valve once every four quarters.
- (5) At process units with less than 0.25 percent leaking valves, Kodak may elect to monitor each valve once every 2 years.

Kodak shall keep a record of the monitoring schedule for each process unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 411: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**



**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 411.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 411.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to leak repair schedules and record keeping in accordance with the requirements of §63.1024 of Subpart UU.

Each leak detected shall be repaired as soon as practical, but not later than 15 calendar days after it is detected.

A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

For each leak detected, the following information shall be recorded and maintained for 5 years beyond the date of the last use of the equipment:

- (1) The date of first attempt to repair the leak.
- (2) The date of successful repair of the leak.
- (3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak if Kodak has developed a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation



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that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.  
(5) Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 412: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 412.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 412.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to the requirements for identifying leaking equipment specified at §63.1023 of Subpart UU. When each equipment leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. The leak identification on a valve may be removed after it has been repaired and the valve has been monitored by Method 21 at least once within the first 3 months after its repair and no leak has been detected during that monitoring. The identification on pumps, agitators and connectors may be removed after it is repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 413: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 413.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 413.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Written plans for equipment monitoring, in accordance with the requirements of §63.1022(c)(4) in Subpart UU, shall be kept on site.

Kodak shall have a written plan that requires monitoring of equipment designated as unsafe-to-monitor as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment if a leak is detected.

Kodak shall have a written plan that requires monitoring of the equipment designated as difficult-to-monitor at least once per calendar year and repair of the equipment if a leak is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 414: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 414.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 414.2:**

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Permit ID: 8-2614-00205/01801

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.1022(b)(5) of Subpart UU, the identity, either by list, location (area or group), or other method, of equipment in regulated material service less than 300 hours per calendar year within a process unit or affected facilities subject to the MON MACT shall be recorded.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 415: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 415.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 415.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Equipment subject to the MON MACT shall be identified according to the requirements specified at §63.1022 in Subpart UU. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods. Note: Equipment includes - pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices used to meet the MON MACT requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 416: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63.2485, Subpart FFFF**

**Item 416.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 416.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

MON MACT requirements for wastewater maintenance procedures identified in Table 7 of Subpart FFFF, must be compliant with Subpart F, 63.105(b) and (c).

Kodak shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance).

The descriptions shall:

- (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;
- (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- (3) Specify the procedures to be followed when clearing materials from process equipment.

Kodak shall modify and update the information in the SCD maintenance wastewater plan (SCD SOP-0152) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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Facility DEC ID: 8261400205



**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 417: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 417.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 417.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.147 of Subpart G for wastewater record keeping.

Kodak shall keep in a readily accessible location the following records for all Group 2 wastewater streams:

- (1) Process unit identification and description of the process unit;
- (2) Stream identification code;
- (3) For existing sources, concentration of Table 9 compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration; and
- (4) Flow rate in liter per minute.

If Kodak uses process knowledge to determine the annual average concentration of a wastewater stream and/or uses process knowledge to determine the annual average flow rate, and determines that the wastewater stream is not a Group 1 wastewater stream, Kodak shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 418: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 418.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 418.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.136 of Subpart G for wastewater drain systems.

Each individual drain system that receives or manages a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream shall be inspected initially, and semi- annually thereafter, for improper work practices and control equipment failures. For individual drain systems, improper work practice includes, but is not limited to, leaving open any access hatch or other opening when such hatch or opening is not in use for sampling or removal, or for equipment inspection, maintenance, or repair.

For individual drain systems, control equipment failure includes, but is not limited to, any time a joint, lid, cover, or door has a gap or crack, or is broken. When an improper work practice or a control equipment failure is identified, first efforts at repair shall be made no later than 5 calendar days after identification and repair shall be completed within 15 calendar days after identification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.



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The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 419: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485(j), Subpart FFFF**

**Item 419.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00053

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

**Item 419.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Kodak must determine the annual average concentration and annual average flow rate for wastewater streams for each MCPU. The procedures for flexible operation units do not apply for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 420: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 420.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00053

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

**Item 420.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

In accordance with 40 CFR 63.2525(f), Kodak must keep a

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record of each time a safety device (e.g. a pressure relief valve, rupture disc, fusible plug, or any other type of device which functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere) is opened to avoid unsafe conditions during the manufacture of a MON covered process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-79: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.10 (c) (4) (iii)**

**Replaces Condition(s) 421**

**Item 1-79.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-79.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with VOC RACT requirements for the batch organic chemical and pharmaceutical and cosmetic manufacturing operations, as determined in the most recent RACT evaluation dated September 2013, the aggregate VOC emissions from Emission Point 325X3 shall not exceed 66 tpy (tons per year) on a rolling twelve-month basis.

1) Records shall be maintained of the quantity of each chemical manufactured (synthesized by chemical reaction), by identification number. The records shall be updated monthly and compiled into a 12 month rolling total. The methods of calculation shall be those described in Mass Balance Calculation Techniques for the Synthetic Chemicals Division (Copyright ©) by Eastman Kodak Company, 1991.





2) At a minimum, 90% of the total chemical production during any given 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions for at least 90% of the total chemical production shall be calculated by multiplying the number of batches of each chemical made in that month by the calculated VOC emissions per batch. The total VOC emission shall be calculated by extrapolating the results on at least 90% of the total chemical production by the following formula:

$$\text{Total VOC emissions} = \text{VOC}(90)/P$$

Where:

Total VOC emissions = total VOC emission from all manufacturing operations;

VOC (90) = VOC emissions from at least 90% of the total chemicals manufactured, and

P = weight proportion of the chemicals with calculated emissions (at least 90%) to all chemicals manufactured.

3) VOC emissions from solvent cleaning of equipment shall be calculated from raw material usage records. Notebooks shall be maintained for each portable cart wash fill station and the following information recorded each time the carts are filled: date, quantity of solvent filled, and initials of person doing the filling. VOC emissions shall be assumed to be 15% of the quantity of solvent filled in the wash carts, unless otherwise determined by subsequent mass balance studies. 4) The sum of VOC emissions from solvent cleaning operations and from chemical manufacturing operations shall be recorded for each month, and a rolling 12 month total established.

5) In order to verify the validity of the engineering calculations used to demonstrate continuous compliance with the 66 ton per year emission limitation, Kodak shall do the following:

a) At least once in every 24 month period after June 1, 2001, emission monitoring shall be performed on a representative source. The emission monitoring shall be designed to measure, with known accuracy, the total VOC emissions from at least one complete reactor system for a



period of at least three days. Engineering calculations shall also be performed on the same representative reactor system, and the calculated emissions compared to the monitored emissions. If the monitored emissions are less than the calculated emissions, then the engineering calculations shall be confirmed as valid. If the monitored values exceed the calculated values, then the calculation methods shall be adjusted accordingly, to more accurately reflect actual emissions.

b) All vapor-tight centrifuges designed for VOC usage shall be checked monthly to ensure that the average leak rate is less than or equal to 1 cubic foot per minute (cfm).

c) All pipe-in-trench systems shall be checked monthly to ensure that the average leak rate is less than or equal to 50 standard cubic feet per hour (scfh).

d) A minimum of 12 reactors shall be checked quarterly to ensure that the average leak rate is less than or equal to 2 pounds per hour at 20 inches Hg vacuum. All reactors shall be checked at least once per year.

e) A minimum of 12 reactor inertion systems shall be checked quarterly to ensure that average fast-nitrogen purge rates will be maintained between 160 and 240 scfh, and average slow-nitrogen purge rates will be maintained between 9 and 13 scfh. All reactor inertion systems shall be checked at least once per year.

f) A minimum of 3 rotary dryers will be checked quarterly to ensure that the average leak rate is less than or equal to 8 lb/hr at 20 inches Hg vacuum. All rotary dryers shall be checked at least once per year.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next reevaluation shall be submitted no later than September 30, 2018.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



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

**Condition 422: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(k)(3), Subpart FFFF**

**Item 422.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 422.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to comply with the monitoring requirements of 40 CFR 63.2450(k)(3) for halogen scrubbers used to control only batch process vents, Kodak shall monitor and record the strength of caustic in the prescrubbers used in combination with scrubbers for the control of hydrogen halide and halide HAP from each Group 1 Halogen HAP process as follows:

- Document the stoichiometrically required amount of caustic to be added to the prescrubber vessel;
- Specify in each affected process description the mass and concentration of caustic solution to be added to the prescrubbbber; and
- Document for each batch the mass and concentration of caustic solution in fact added to the prescrubber.

These records shall be retained for 5 years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 423: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2460(b), Subpart FFFF**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 423.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 423.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to satisfy the requirements for processes with batch process vents, Kodak must determine the group status of the batch process vents by determining and summing the uncontrolled organic HAP emissions from each of the batch process vents within the process using the SynChem MON MACT Estimating Model, based on the procedures specified in §63.1257(d)(2)(i) and (ii), except as specified in paragraphs 2460(b)(1) through (7).

In order to meet the requirements of paragraph 63.2460(b)(4) for vessels equipped with a process condenser, Kodak must calculate the uncontrolled emissions by using the SynChem MON MACT Estimating Model as follows:

- (i) Kodak must determine the flowrate of gas (or volume of gas), partial pressures of condensables, temperature (T), and HAP molecular weight (MW HAP) at the exit temperature and exit pressure conditions of the condenser or at the conditions of the dedicated receiver.
- (ii) Kodak must assume that all of the components contained in the condenser exit vent stream are in equilibrium with the same components in the exit condensate stream (except for noncondensables).
- (iii) Kodak must perform a material balance for each component.
- (iv) Emissions from empty vessel purging shall be calculated using the exit temperature and exit pressure conditions of the condenser or the conditions of the dedicated receiver.
- (v) Kodak must conduct an engineering assessment for each emission episode that is not due to vapor displacement, purging, heating, depressurization, vacuum operations, gas evolution, air drying, or empty vessel purging.
- (vi) Kodak may elect to conduct an engineering assessment if it can demonstrate to the EPA that the MON MACT methods are not appropriate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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Facility DEC ID: 8261400205



**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 424: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2465(b), Subpart FFFF**

**Item 424.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 424.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If any process vents within a process emit hydrogen halide and halogen HAP, Kodak must determine and sum the uncontrolled hydrogen halide and halogen HAP emissions from each of the process vents within the process using the SynChem MON MACT Estimating Model in accordance with the procedures specified in §63.1257(d)(2)(i) and/or (ii), as appropriate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 425: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 425.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Regulated Contaminant(s):



CAS No: ONY100-00-0 TOTAL HAP

**Item 425.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water Leak Detection and Repair (LDAR) monitoring according the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(a), (b) or (c).

For process condensers with cooling water, Kodak has elected to comply with 63.104(a) by operating each condenser with a minimum pressure on the cooling water side at least 35 kilopascals (5.1 psi) greater than the maximum pressure on the process side.

For reactor jackets with cooling water, Kodak has elected to comply with 63.104(c) by monitoring a surrogate indicator of heat exchange system leaks. Kodak shall:

(1) prepare and implement a monitoring plan (SCD SOP - 2444) that documents the procedures that will be used to detect leaks of process fluids from reactors into cooling water in the reactor jacket. The plans includes:

- (i) A description of the parameter or condition to be monitored and an explanation of how the selected parameter or condition will reliably indicate the presence of a leak.
- (ii) The parameter level(s) or conditions(s) that shall constitute a leak. This shall be documented by data or calculations showing that the selected levels or conditions will reliably identify leaks. The monitoring must be sufficiently sensitive to determine the range of parameter levels or conditions when the system is not leaking. When the selected parameter level or condition is outside that range, a leak is indicated.
- (iii) The monitoring frequency which shall be no less frequent than monthly for the first 6 months and quarterly thereafter to detect leaks.
- (iv) The records that will be maintained to document compliance with the requirements of this section.

(2) If a substantial leak is identified by methods other than those described in the monitoring plan and the method(s) specified in the plan could not detect the leak, the owner or operator shall revise the plan and document the basis for the changes. The owner or operator shall

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complete the revisions to the plan no later than 180 days after discovery of the leak.

(3) The owner or operator shall maintain, at all times, the monitoring plan that is currently in use. The current plan shall be maintained on-site, or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. If the monitoring plan is superseded, the owner or operator shall retain the most recent superseded plan at least until 5 years from the date of its creation. The superseded plan shall be retained on-site (or accessible from a central location by computer or other means that provides access within two hours after a request) for at least 6 months after its creation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 426: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 426.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 426.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water LDAR leak repair according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(d).

If a leak is detected, Kodak shall comply with the following requirements:

(1) The leak shall be repaired as soon as practical but not later than 45 calendar days after Kodak receives results of monitoring tests indicating a leak. The leak



shall be repaired unless Kodak demonstrates that the results are due to a condition other than a leak.

(2) Once the leak has been repaired, Kodak shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown. All time periods shall be determined from the date when Kodak determines that delay of repair is necessary. If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.

If a shutdown is not expected within the next 2 months documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as practical. If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, Kodak may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. Kodak shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as follows:

- (1) Calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. Kodak may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in Table 4; and
- (2) Determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

If repair is delayed for any other reasons, Kodak may delay repair up to a maximum of 120 calendar days. Kodak shall demonstrate that the necessary parts or personnel were not available.

Kodak shall retain the following records:

- (1) Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
- (2) Records of any leaks detected and the date the leak



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was discovered;

(3) The dates of efforts to repair leaks; and

(4) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

If Kodak invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported:

(1) The presence of the leak and the date that the leak was detected;

(2) Whether or not the leak has been repaired;

(3) The reason(s) for delay of repair. If delay of repair is invoked because repair would cause greater emissions than the potential emissions from delaying repair, documentation of emissions estimates must also be submitted;

(4) If the leak remains unrepaired, report the expected date of repair; and

(5) If the leak is repaired, report the date the leak was successfully repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 427: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2525, Subpart FFFF**

**Item 427.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 427.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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In accordance with the requirements of 40 CFR 63.2525(e), Kodak shall keep records for Group 2 Batch Process Vents as follows:

For Low Volume Group 2 processes with < 10,000 lb/yr OHAP usage Kodak must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the third paragraph below. After 1 year, Kodak may revert to recording only usage if the usage during the year is less than 10,000 lb.

For Mid Volume Group 2 processes with < 1,000 lb/yr OHAP emissions Kodak must keep records of the number of batches operated and calculate a daily rolling annual sum of batches operated no less frequently than monthly. If the number of batches operated results in organic HAP emissions that exceed 1,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the paragraph below. After 1 year, Kodak may revert to recording only the number of batches if the number of batches operated during the year results in less than 1,000 lb of organic HAP emissions.

For High Volume Group 2 processes with > 1,000 lb/yr OHAP emissions Kodak must keep the following records:

- (i) A record of the day each batch was completed and/or the operating hours per day for continuous operations with hydrogen halide and halogen emissions;
- (ii) A record of whether each batch operated was considered a standard batch;
- (iii) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch; and
- (iv) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

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**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 428.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053  
Process: I35

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

**Item 428.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c), Kodak must maintain a schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 429:      Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 429.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053  
Process: I35

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

**Item 429.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each



operating scenario:

- (1) A description of the process and the type of process equipment used;
- (2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;
- (3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;
- (4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;
- (5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);
- (6) The applicable monitoring requirements and any parametric level that assures compliance for all emissions routed to the control device or treatment process;
- (7) Calculations and engineering analyses required to demonstrate compliance; and
- (8) For reporting purposes, a change to any of these elements not previously reported, except for item (5) above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 430: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 430.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I35

Emission Source: 325AT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 430.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, the annual emissions of Volatile Organic Compounds (VOC) from the Wiped Film Evaporator, ES 325AT, shall not exceed 3.7 tpy (tons per year) on a rolling twelve-month basis. Emissions of VOCs shall be calculated on a monthly basis from the batch numbers and the total estimated VOC emissions per batch, and incorporated into a twelve-month rolling total, expressed in tpy. These records shall be retained on site for five years and made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 3.7 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 431: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 229.3 (e) (2) (v)**

**Item 431.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Process: I47

**Item 431.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 432: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.5 (d)**

**Item 432.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053  
Process: I47

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 432.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 12 calendar month(s).

**Condition 434: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 434.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053 Emission Point: 325X3

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 434.2:**

Compliance Certification shall include the following monitoring:

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

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**Monitoring Description:**

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. To ensure particulate removal, Kodak shall operate and maintain the scrubbers (Control devices 32502, 32503, 32510, 32511, 32512, 32513, 32514, 32515, and 32516) by performing the following:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.
- 3) Operating and maintenance records as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site and made available to the Department upon request.
- 4) Compliance testing using EPA Method 5 will be conducted at the discretion of the Department.

Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 7 pH (STANDARD) units  
Reference Test Method: EPA Method 5  
Monitoring Frequency: WEEKLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-80: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 437**

**Item 1-80.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053	Emission Point: 325X3
Process: I35	Emission Source: 325AP

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

**Item 1-80.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The closed vent systems and control devices used to control Group 1 Halogen HAP processes in Emission Unit U-00053 are subject to the equipment leak record keeping requirements specified under §63.998(d)(4) of Subpart SS. Kodak shall maintain records of the following information for the closed vent systems and control devices:

(1) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams; the dates and descriptions of any changes in the design specifications; and a description of the parameter or parameters monitored to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. These records shall be retained for the life of the equipment.

(2) Dates and durations when the closed vent systems and control devices required are not operated as designed as indicated by the monitored parameters; dates and durations during which the monitoring system or monitoring device is inoperative; and dates and durations of start-ups and shutdowns of required control devices. These records shall be retained for five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 435: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 435.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053                      Emission Point: 325X3  
Process: I35                                      Emission Source: 325AP

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



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**Item 435.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.998(d)(5) of Subpart SS, Kodak shall record the occurrences and the cause of periods when the monitored parameters are outside of the parameter ranges documented in the Notification of Compliance Status report. This information shall also be reported in the Periodic Report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 436: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 436.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Emission Point: 325X3

Process: I35

Emission Source: 325AP

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 436.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For HCl Scrubber Systems subject to the MON MACT, Kodak shall comply with the equipment leak record keeping requirements specified under §63.998(d)(4) of Subpart SS. Kodak shall maintain the following records:

- (1) Dates and durations when the scrubber systems required are not operated as designed as indicated by the monitored parameters;
- (2) Dates and durations during which the monitoring system or monitoring device is inoperative; and
- (3) Dates and durations of start-ups and shutdowns of required control devices.

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These records shall be retained for 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-81: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2465(c)(1), Subpart FFFF**

**Replaces Condition(s) 440**

**Item 1-81.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Emission Point: 325X3

Process: I35

Emission Source: 325AP

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-81.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B325 Building Scrubber (Control Device 32503) associated with emission sources ducted to Emission Point 325X3 shall be maintained and operated in conjunction with the B325 Prescrubber Vessel 1061 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the recirculating solution flow rate.

Kodak shall operate a flow meter capable of providing a continuous record of liquid flow at the scrubber influent.

The flow rate of recirculating scrubber solution shall be maintained above 200 gallons per minute at all times that Group 1 Halogen HAP processes are operating.

The scrubber solution flow rate shall be monitored on a continuous basis (at least once per minute) and data shall



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be recorded on a 1-hour block average basis. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE  
Lower Permit Limit: 200 gallons per minute  
Monitoring Frequency: CONTINUOUS  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-82: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2465(c)(1), Subpart FFFF**

**Replaces Condition(s) 438**

**Item 1-82.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053                      Emission Point: 325X3  
Process: I35                                      Emission Source: 325AP

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

**Item 1-82.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B325 Building Scrubber (Control Device 32503) associated with emission sources ducted to Emission Point 325X3 shall be maintained and operated in conjunction with the B325 Prescrubber Vessel 1061 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the scrubber solution pH.

Kodak shall use a pH monitoring device capable of providing a continuous record of the pH of the scrubber effluent to ensure that the scrubber solution pH is maintained above 8.3 at all times that Group 1 Halogen HAP processes are operating. The pH shall be recorded at the

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start of each Group 1 Halogen HAP process (per 63.2450(k)(3)). Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: PH

Lower Permit Limit: 8.3 pH (STANDARD) units

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 439: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2465(c)(1), Subpart FFFF**

**Item 439.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00053

Emission Point: 325X3

Process: I35

Emission Source: 325AP

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 439.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B325 Prescrubber Vessel 1061 associated with emission sources ducted to Emission Point 325X3 shall be maintained and operated in conjunction with the B325 Building Scrubber (Control Device 32503) to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall verify prior to the start of each Group 1 process batch that the caustic/gas ratio is greater than 1.5 moles of NaOH per mole of Gas and that the total volume of liquid in the prescrubber vessel is greater than 350 gallons.

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Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE  
Lower Permit Limit: 350 gallons  
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 441: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2525, Subpart FFFF**

**Item 441.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00053                      Emission Point: 325X3  
Process: I35                                      Emission Source: 325AP

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

**Item 441.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(g), for a Continuous Parameter Monitoring System (CPMS) on process vents controlling Group 1 halogen HAP processes (Bay 9/10 Scrubber Solution Flow Monitor and pH Monitor), Kodak shall keep the following records:  
(1) A record of the procedure used for calibrating the CPMS; and  
(2) The results of each calibration check and all maintenance performed on the CPMS must be recorded including the date and time of completion of calibration and preventive maintenance of the CPMS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

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**Condition 442: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 6 NYCRR 233.3**

**Item 442.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 442.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233 control requirements in paragraphs 233.3(a), (b), (e) and (f) for manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park as follows:

- (i) Kodak shall develop an Emission Rate Potential (ERP) for Volatile Organic Compounds (VOCs) for each reactor, extractor, distillation operation, crystallizer, centrifuge, vacuum dryer, air dryer, and production exhaust system that will be used to manufacture pharmaceutical or cosmetic products.
- (ii) Kodak shall not use any reactor, extractor, distillation operation, crystallizer, centrifuge or vacuum dryer that has an ERP for VOCs greater than 15 pounds per day to manufacture pharmaceutical or cosmetic products.
- (iii) Kodak shall not perform any pharmaceutical or cosmetic manufacturing processes which use any combination of air dryers and production exhaust systems with a total ERP for VOCs greater than 33 pounds per day.
- (iv) All centrifuges containing volatile organic compounds, rotary vacuum filters processing volatile organic compounds and any other filters having an exposed liquid surface where the liquid contains volatile organic compounds having an exposed liquid surface and exerts a total vapor pressure of 0.5 psi or more at 20° C must be enclosed unless production, sampling, maintenance, or inspection procedures require operator access.

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(v) For all in-process tanks containing a volatile organic compound, covers must be installed on openings to these tanks. Tank openings must remain covered unless production, sampling, maintenance, or inspection procedures require operator access.

(vi) Kodak shall keep records of all ERP determinations and process write-ups documenting all equipment which is used in each pharmaceutical and cosmetic manufacturing process.

(vii) Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 443: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 233.3 (g)**

**Item 443.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 443.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233 leak requirements for manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park as follows:

(i) For all air dryers and production exhaust systems used in any pharmaceutical or cosmetic manufacturing process, Kodak must repair all leaks from which a liquid containing volatile organic compounds can be observed running or dripping the first time the equipment is off-line for a

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period of time long enough to complete the repair, but not later than 15 days after the leak is discovered. If the leaking component cannot be repaired while being used on pharmaceutical or cosmetic manufacturing processes until the process is shut down, and a shut down cannot be done within the 15 days after the leak is detected, the leaking component must then be repaired before the process is restarted.

(ii) Kodak shall keep records of all process write-ups documenting all air dryers and production exhaust systems which are used in each pharmaceutical and cosmetic manufacturing process.

(iii) Kodak shall keep the following records for any leak on air dryers and production exhaust systems described above which cannot be readily repaired within one day after detection:

- (1) the name of the leaking equipment;
- (2) the date and time the leak is detected;
- (3) the action taken to repair the leak; and
- (4) the date and time the leak is repaired.

(iv) Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 444: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 444.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 444.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



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Leak detection procedures for pumps shall be conducted in accordance with the requirements of §63.1026 of Subpart UU.

(a) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. Kodak shall document that the inspection was conducted and the date of the inspection.

If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, Kodak shall:

(1) Monitor the pump using Method 21. If the instrument reading indicates a leak, a leak is detected and it shall be repaired; or

(2) Kodak shall eliminate the visual indications of liquids dripping.

(b) Kodak shall monitor each pump monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 ppmv for batch process pumps.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 445: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 445.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 445.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak Detection and Repair (LDAR) monitoring for open-ended valves or lines shall be conducted in accordance with §63.1033(a) of Subpart UU.



Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply at all other times.

Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from these requirements.

Open-ended valves or lines containing materials that would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system are also exempt from these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 446: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 446.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 446.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall monitor each valve at the intervals described below to detect leaks by Method 21. The instrument

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reading that defines a leak is 500 parts per million or greater for all valves in gas and vapor service and in light liquid service.

In accordance with §63.1025(b) of Subpart UU, Kodak shall monitor valves for leaks at the following intervals:

(1) If at least the greater of 2 valves or 2 percent of the valves in a process unit leak Kodak shall monitor each valve once per month.

(2) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, Kodak shall monitor each valve once each quarter. Monitoring data generated before the regulated source became subject to the MON MACT may be used to qualify initially for less frequent monitoring.

(3) At process units with less than 1 percent leaking valves, Kodak may elect to monitor each valve once every two quarters.

(4) At process units with less than 0.5 percent leaking valves, Kodak may elect to monitor each valve once every four quarters.

(5) At process units with less than 0.25 percent leaking valves, Kodak may elect to monitor each valve once every 2 years.

Kodak shall keep a record of the monitoring schedule for each process unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 447: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 447.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

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**Item 447.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to leak repair schedules and record keeping in accordance with the requirements of §63.1024 of Subpart UU.

Each leak detected shall be repaired as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

For each leak detected, the following information shall be recorded and maintained for 5 years beyond the date of the last use of the equipment:

- (1) The date of first attempt to repair the leak.
- (2) The date of successful repair of the leak.
- (3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak if Kodak has developed a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
- (5) Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 448: Compliance Certification**

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**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 448.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 448.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to the requirements for identifying leaking equipment specified at §63.1023 of Subpart UU. When each equipment leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. The leak identification on a valve may be removed after it has been repaired and the valve has been monitored by Method 21 at least once within the first 3 months after its repair and no leak has been detected during that monitoring. The identification on pumps, agitators and connectors may be removed after it is repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 449: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 449.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 449.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Equipment subject to the MON MACT shall be identified according to the requirements specified at §63.1022 in Subpart UU. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods. Note: Equipment includes - pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices used to meet the MON MACT requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-83: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 1-83.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-83.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.136 of Subpart G for wastewater drain systems.

Each individual drain system that receives or manages a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream shall be inspected initially, and semi- annually thereafter, for improper work practices and control equipment failures. For individual drain systems, improper work practice includes, but is not limited to, leaving open any access hatch or other opening

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when such hatch or opening is not in use for sampling or removal, or for equipment inspection, maintenance, or repair.

For individual drain systems, control equipment failure includes, but is not limited to, any time a joint, lid, cover, or door has a gap or crack, or is broken. When an improper work practice or a control equipment failure is identified, first efforts at repair shall be made no later than 5 calendar days after identification and repair shall be completed within 15 calendar days after identification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 450: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 450.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 450.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Wastewaters subject to the MON MACT requirements for wastewater maintenance procedures according the applicability identified in Table 7 of Subpart FFFF, must be compliant with Subpart F, 63.105(b) and (c).

Kodak shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance).

The descriptions shall:

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- (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;
- (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- (3) Specify the procedures to be followed when clearing materials from process equipment.

Kodak shall modify and update the information in the SCD maintenance wastewater plan (SCD SOP-0152) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 451: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 451.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 451.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water Leak Detection and Repair (LDAR) monitoring according the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(a), (b) or (c).

For process condensers with cooling water, Kodak has elected to comply with 63.104(a) by operating each condenser with a minimum pressure on the cooling water side at least 35 kilopascals (5.1 psi) greater than the maximum pressure on the process side.





For reactor jackets with cooling water, Kodak has elected to comply with 63.104(c) by monitoring a surrogate indicator of heat exchange system leaks. Kodak shall:

1) prepare and implement a monitoring plan (SCD SOP-2444) that documents the procedures that will be used to detect leaks of process fluids from reactor into cooling water in the reactor jacket. The plans includes:

- (i) A description of the parameter or condition to be monitored and an explanation of how the selected parameter or condition will reliably indicate the presence of a leak.
- (ii) The parameter level(s) or conditions(s) that shall constitute a leak. This shall be documented by data or calculations showing that the selected levels or conditions will reliably identify leaks. The monitoring must be sufficiently sensitive to determine the range of parameter levels or conditions when the system is not leaking. When the selected parameter level or condition is outside that range, a leak is indicated.
- (iii) The monitoring frequency which shall be no less frequent than monthly for the first 6 months and quarterly thereafter to detect leaks.
- (iv) The records that will be maintained to document compliance with the requirements of this section.

(2) If a substantial leak is identified by methods other than those described in the monitoring plan and the method(s) specified in the plan could not detect the leak, the owner or operator shall revise the plan and document the basis for the changes. The owner or operator shall complete the revisions to the plan no later than 180 days after discovery of the leak.

(3) The owner or operator shall maintain, at all times, the monitoring plan that is currently in use. The current plan shall be maintained on-site, or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. If the monitoring plan is superseded, the owner or operator shall retain the most recent superseded plan at least until 5 years from the date of its creation. The superseded plan shall be retained on-site (or accessible from a central location by computer or other means that provides access within two hours after a request) for at least 6 months after its creation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 452: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 452.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 452.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water LDAR leak repair according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(d).

If a leak is detected, Kodak shall comply with the following requirements:

- (1) The leak shall be repaired as soon as practical but not later than 45 calendar days after Kodak receives results of monitoring tests indicating a leak. The leak shall be repaired unless Kodak demonstrates that the results are due to a condition other than a leak.
- (2) Once the leak has been repaired, Kodak shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown. All time periods shall be determined from the date when Kodak determines that delay of repair is necessary. If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.

If a shutdown is not expected within the next 2 months documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a



schedule for completing the repair as soon as practical. If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, Kodak may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. Kodak shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as follows:

- (1) Calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. Kodak may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in Table 4; and
- (2) Determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

If repair is delayed for any other reasons, Kodak may delay repair up to a maximum of 120 calendar days. Kodak shall demonstrate that the necessary parts or personnel were not available.

Kodak shall retain the following records:

- (1) Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
- (2) Records of any leaks detected and the date the leak was discovered;
- (3) The dates of efforts to repair leaks; and
- (4) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

If Kodak invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported:

- (1) The presence of the leak and the date that the leak was detected;
- (2) Whether or not the leak has been repaired;
- (3) The reason(s) for delay of repair. If delay of repair is invoked because repair would cause greater emissions than the potential emissions from delaying repair, documentation of emissions estimates must also be submitted;
- (4) If the leak remains unrepaired, report the expected

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date of repair; and  
(5) If the leak is repaired, report the date the leak was successfully repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 453: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 453.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 453.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(e), Kodak shall keep records for Group 2 Batch Process Vents as follows:

For Low Volume Group 2 processes with < 10,000 lb/yr OHAP usage Kodak must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the third paragraph below. After 1 year, Kodak may revert to recording only usage if the usage during the year is less than 10,000 lb.

For Mid Volume Group 2 processes with < 1,000 lb/yr OHAP emissions Kodak must keep records of the number of batches operated and calculate a daily rolling annual sum of batches operated no less frequently than monthly. If the number of batches operated results in organic HAP emissions that exceed 1,000 lb/yr, Kodak must estimate

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emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the paragraph below. After 1 year, Kodak may revert to recording only the number of batches if the number of batches operated during the year results in less than 1,000 lb of organic HAP emissions.

For High Volume Group 2 processes with > 1,000 lb/yr OHAP emissions Kodak must keep the following records:

- (i) A record of the day each batch was completed and/or the operating hours per day for continuous operations with hydrogen halide and halogen emissions;
- (ii) A record of whether each batch operated was considered a standard batch;
- (iii) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch; and
- (iv) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 454: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 454.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 454.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 40 CFR 63.2525(f), Kodak must keep a record of each time a safety device (e.g. a pressure relief valve, rupture disc, fusible plug, or any other type of device which functions exclusively to prevent

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physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere) is opened to avoid unsafe conditions during the manufacture of a MON covered process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-84: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Replaces Condition(s) 455**

**Item 1-84.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Process: I33

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-84.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for agitator seals shall be conducted in accordance with the requirements of §63.1028(c) of Subpart UU as follows:

a) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, Kodak shall monitor each agitator seal monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 parts per million or greater.

b) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, each agitator seal shall be checked by visual inspection each calendar week for indications of liquids dripping from the agitator seal. Kodak shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the agitator seal at the time of the weekly inspection, prior to the next required inspection, Kodak shall:

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- 1) Monitor the agitator seal using Method 21. If an instrument reading of 10,000 parts per million or greater is measured, a leak is detected and it shall be repaired;  
or
- 2) Eliminate the indications of liquids dripping from the agitator seal.

The following agitators are exempt from these monthly monitoring requirements:

- (1) Any agitator that is designed with no externally actuated shaft penetrating the agitator housing.
- (2) Any agitator that is routed to a process system that captures and transports leakage from the agitator to a control device.
- (3) Any agitator seal that is designated as difficult-to-monitor and Kodak monitors the agitator seal according to a written plan.
- (4) Any agitator seal that is obstructed by equipment or piping that prevents access to the agitator by a monitor probe.
- (5) Any agitator seal that is designated as unsafe-to-monitor and Kodak monitors the agitator seal according to a written plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 456: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2485, Subpart FFFF**

**Item 456.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Process: I33

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 456.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.147 of Subpart



G for wastewater record keeping.

Kodak shall keep in a readily accessible location the following records for all Group 2 wastewater streams:

- (1) Process unit identification and description of the process unit;
- (2) Stream identification code;
- (3) For existing sources, concentration of Table 9 compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration; and
- (4) Flow rate in liter per minute.

If Kodak uses process knowledge to determine the annual average concentration of a wastewater stream and/or uses process knowledge to determine the annual average flow rate, and determines that the wastewater stream is not a Group 1 wastewater stream, Kodak shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 457: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2525, Subpart FFFF**

**Item 457.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Process: I33

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 457.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c),





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Kodak must maintain a schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 458: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 458.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Process: I33

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 458.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each operating scenario:

- (1) A description of the process and the type of process equipment used;
- (2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;
- (3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;
- (4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;
- (5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);
- (6) The applicable monitoring requirements and any



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parametric level that assures compliance for all emissions routed to the control device or treatment process;  
(7) Calculations and engineering analyses required to demonstrate compliance; and  
(8) For reporting purposes, a change to any of these elements not previously reported, except for item (5) above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 459: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)**

**Item 459.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Process: I48

**Item 459.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 460: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.5 (d)**

**Item 460.1:**

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The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Process: I48

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 460.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 461: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.10 (c) (4) (iii)**

**Item 461.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Emission Point: 304A8

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 461.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.10 RACT (Reasonably Available Control Technology) for emissions of Volatile Organic Compounds (VOC) from Process I33 (EP 304A8), the annual emissions of VOCs regulated by Part 212 from this source shall not exceed 9.03 tons per year (tpy) on a rolling twelve-month basis. The sum of VOC emissions from chemical manufacturing and solvent cleaning operations shall be recorded for each month and incorporated into a 12-month rolling total.



Emissions of VOCs shall be calculated on a monthly basis. Calculations for chemical manufacturing operations shall be based on:

- 1) Records for the quantity of each chemical manufactured (synthesized by chemical reaction) by identification number, and
- 2) Engineering calculations (using mass balance calculation techniques for the Synthetic Chemicals Division© by Eastman Kodak Company, 1991, or equivalent methods).

At a minimum, 90% of the total chemical production during any 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions for at least 90% of the total chemical production shall be calculated by multiplying the number of batches of each chemical made in that month by the calculated VOC emissions per batch. The total VOC emission shall be calculated by extrapolating the results on at least 90% of the total chemical production by the following formula:

$$\text{Total VOC emissions} = \text{VOC}(90)/P$$

Where: Total VOC emissions = total VOC emission from all manufacturing operations

$\text{VOC}(90)$  = VOC emissions from at least 90% of the total chemicals manufactured, and

P = weight proportion of the chemicals with calculated emissions (at least 90%) to all chemicals manufactured.

Emissions from solvent cleaning operations will be based on:

- 1) raw material usage records maintained for each portable cart wash fill station, and
- 2) an emission factor of 15% of the quantity of VOC solvent filled in the wash carts, unless otherwise determined by subsequent mass balance studies.

Emissions of VOCs shall be calculated on a monthly basis using the methodology from above and incorporated into a twelve month rolling total, expressed in tons/year (tpy). These records shall be

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retained on site for five years and made available to the Department upon request. This RACT determination was based on an evaluation of EP 304A8 as well as other RACT applicable emission points in the North Chemical Dept (EU U-00060), dated September 24, 2010, and shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next re-evaluation shall be submitted no later than September 30, 2015.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 462: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 462.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056

Emission Point: 304A8

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 462.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, the annual emissions of VOCs regulated by Part 212 from Process I33 (EP 304A8) shall not exceed 9.0 tons per year (tpy) on a rolling twelve-month basis. The sum of VOC emissions from chemical manufacturing and solvent cleaning operations shall be recorded for each month and incorporated into a 12-month rolling total.

Emissions of VOCs shall be calculated on a monthly basis. Calculations for chemical manufacturing operations shall be based on:

1) Records for the quantity of each chemical manufactured



(synthesized by chemical reaction) by identification number, and  
2) Engineering calculations (using mass balance calculation techniques for the Synthetic Chemicals Division© by Eastman Kodak Company, 1991, or equivalent methods).

At a minimum, 90% of the total chemical production during any 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions for at least 90% of the total chemical production shall be calculated by multiplying the number of batches of each chemical made in that month by the calculated VOC emissions per batch. The total VOC emission shall be calculated by extrapolating the results on at least 90% of the total chemical production by the following formula:

$$\text{Total VOC emissions} = \text{VOC}(90)/P$$

Where: Total VOC emissions = total VOC emission from all manufacturing operations

$\text{VOC}(90)$  = VOC emissions from at least 90% of the total chemicals manufactured, and

$P$  = weight proportion of the chemicals with calculated emissions (at least 90%) to all chemicals manufactured.

Emissions from solvent cleaning operations will be based on:

- 1) raw material usage records maintained for each portable cart wash fill station, and
- 2) an emission factor of 15% of the quantity of VOC solvent filled in the wash carts, unless otherwise determined by subsequent mass balance studies.

Emissions of VOCs shall be calculated on a monthly basis using the sample calculations from above and incorporated into a twelve-month rolling total, expressed in tpy.

These records shall be retained on site for five years and made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 9.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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The initial report is due 3/1/2012.  
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**Condition 463: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 463.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056                      Emission Point: 304A8  
Process: I33

**Item 463.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 464: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 464.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00056                      Emission Point: 304A8  
Process: I33

**Item 464.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible





emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-85: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Replaces Condition(s) 526**

**Item 1-85.1:**  
The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00060	Emission Point: 337A2
Emission Unit: U-00060	Emission Point: 337A3
Emission Unit: U-00060	Emission Point: 337A4
Emission Unit: U-00060	Emission Point: 337A5

**Item 1-85.2:**  
Compliance Certification shall include the following monitoring:

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

Monitoring Description:  
In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas,

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expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-86: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Replaces Condition(s) 507**

**Item 1-86.1:**

The Compliance Certification activity will be performed for the facility:



The Compliance Certification applies to:

Emission Unit: U-00060	Emission Point: 30105
Emission Unit: U-00060	Emission Point: 303A8
Emission Unit: U-00060	Emission Point: 303B1
Emission Unit: U-00060	Emission Point: 303X1
Emission Unit: U-00060	Emission Point: 303X2
Emission Unit: U-00060	Emission Point: 303X3
Emission Unit: U-00060	Emission Point: 30403
Emission Unit: U-00060	Emission Point: 304A0
Emission Unit: U-00060	Emission Point: 304B0
Emission Unit: U-00060	Emission Point: 304X1
Emission Unit: U-00060	Emission Point: 304X2
Emission Unit: U-00060	Emission Point: 337A2
Emission Unit: U-00060	Emission Point: 337A3
Emission Unit: U-00060	Emission Point: 337A4
Emission Unit: U-00060	Emission Point: 337A5

**Item 1-86.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-87: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)**

**Replaces Condition(s) 465**

**Item 1-87.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 1-87.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

In order to maintain compliance with VOC RACT for the batch synthetic chemical and pharmaceutical and cosmetic manufacturing operations, as determined in the RACT evaluation dated September 24, 2010 (revision of the September 30, 2005 evaluation), the total emissions of VOCs from this emission unit shall not exceed 150 tpy on a



12 month rolling basis.

Calculations for large scale chemical manufacturing operations in B-303 and B-304 shall be based on 1) records for the quantity of each chemical manufactured (synthesized by chemical reaction) by identification number, and 2) engineering calculations (using mass balance calculation techniques for the Synthetic Chemicals Division© by Eastman Kodak Company, 1991, or equivalent methods). The records shall be updated monthly and compiled into a twelve month rolling total.

At a minimum, 90% of the total chemical production during any 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions for at least 90% of the total chemical production shall be calculated by multiplying the number of batches of each chemical made in that month by the calculated VOC emissions per batch. The total VOC emission shall be calculated by extrapolating the results on at least 90% of the total chemical production by the following formula:

$$\text{Total VOC emissions} = \text{VOC}(90)/P$$

Where:

Total VOC emissions = total VOC emission from all manufacturing operations

VOC(90) = VOC emissions from at least 90% of the total chemicals manufactured, and

P= weight proportion of the chemicals with calculated emissions (at least 90%) to all chemicals manufactured

For small scale chemical manufacturing operations in B-337, monthly records of emissions shall be maintained within the operating area, and shall be made available for review by the Department on request. The records shall consist of raw material usage data, engineering calculations based on established emission factors, and a log showing the twelve month rolling total of VOC emissions. Each month the rolling total from the small scale operations shall be added to the rolling total calculated from the large scale operations to compute the total VOC emissions for Emission Unit U-00060.

Emissions from solvent cleaning operations will be based on 1) raw material usage records maintained for each portable cart wash fill station, and 2) an emission factor



of 15% of the quantity of VOC solvent filled in the wash carts, unless otherwise determined by subsequent mass balance studies.

In order to verify the validity of the engineering calculations used to demonstrate continuous compliance with the 150 ton per year emission limitation, Kodak shall do the following:

- (a) At least once in every 24 month period after June 1, 2001, emission monitoring shall be performed on a representative source. The emission monitoring shall be designed to measure, with known accuracy, the total VOC emissions from at least one complete reactor system for a period of at least three days. Engineering calculations shall also be performed on the same representative source reactor system, and the calculated emissions compared to the monitored emissions. If the monitored emissions are less than the calculated emissions, then the engineering calculations shall be confirmed as valid. If the monitored values exceed the calculated values, then the calculation methods shall be adjusted accordingly, to more accurately reflect actual emissions.
- (b) All vapor-tight centrifuges designed for VOC usage shall be checked monthly to ensure that the average leak rate is less than or equal to 1cubic foot per minute (cfm).
- (c) All Pipe-in-trench systems shall be checked monthly to ensure that the average leak rate is less than or equal to 50 standard cubic feet per hour (scfh).
- (d) A minimum of 12 reactors shall be checked quarterly to ensure that the average leak rate is less than or equal to 2 lb/hr (pounds per hour) at 20 inches Hg vacuum. All reactors will be checked at least once per year.
- (e) A minimum of 12 reactor inertion systems shall be checked quarterly to ensure that average fast-nitrogen purge rates will be maintained between 160 and 240 scfh and average slow-nitrogen purge rates will be maintained between 9 and 13 scfh. All reactor inertion systems will be checked at least once per year.
- (f) A minimum of 6 rotary dryers will be checked quarterly to ensure that the average leak rate is less than or equal to 8 lb/hr at 20 inches Hg vacuum. All rotary dryers will be checked at least once per year.

These records shall be retained on site for five years and

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made available to the Department upon request. The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next re-evaluation shall be submitted no later than September 30, 2015.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 466: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 233.3**

**Item 466.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 466.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233(e) and (f) control requirements for manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park as follows:

(i) All centrifuges containing volatile organic compounds, rotary vacuum filters processing volatile organic compounds and any other filters having an exposed liquid surface where the liquid contains volatile organic compounds having an exposed liquid surface and exerts a total vapor pressure of 0.5 psi or more at 20° C must be enclosed unless production, sampling, maintenance, or inspection procedures require operator access.

(ii) For all in-process tanks containing a volatile organic compound, covers must be installed on openings to these tanks. Tank openings must remain covered unless production, sampling, maintenance, or

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inspection  
procedures require operator access.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 467: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 233.3 (g)**

**Item 467.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 467.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall maintain compliance with 6 NYCRR Part 233  
leak requirements for manufacturing Pharmaceutical and  
Cosmetic Products in Synthetic Chemicals Division at  
Eastman Business Park as follows:

(i) For all equipment used in any pharmaceutical or  
cosmetic manufacturing process, Kodak must repair all  
leaks from which a liquid containing volatile organic  
compounds can be observed running or dripping the first  
time the equipment is off-line for a period of time long  
enough to complete the repair, but not later than 15 days  
after the leak is discovered. If the leaking component  
cannot be repaired while being used on pharmaceutical or  
cosmetic manufacturing processes until the process is shut  
down, and a shut down cannot be done within the 15 days  
after the leak is detected, the leaking component must  
then be repaired before the process is restarted.

(ii) Kodak shall keep records of all equipment which is  
used in each pharmaceutical and cosmetic manufacturing  
process.



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(iii) Kodak shall keep the following records for any leaks described above which cannot be readily repaired within one day after detection:

- (1) the name of the leaking equipment;
- (2) the date and time the leak is detected;
- (3) the action taken to repair the leak; and
- (4) the date and time the leak is repaired.

(iv) Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 468: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 233.3 (h) (1)**

**Item 468.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 468.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6NYCRR Part 233 (a) and (b) control requirements while manufacturing Pharmaceutical and Cosmetic Products in Synthetic Chemicals Division at Eastman Business Park:

(i) Kodak shall operate surface condensers on reactors, extractors, distillation operations, crystallizers, centrifuges and vacuum dryers in Emission Unit U-00060 as follows:

Equipment with surface condensers using glycol as a coolant (identified below), shall operate with a maximum condenser coolant temperature of -10 degrees C.

Vessel 30901

Vessel 30961

Vessel 30991



Vessel 41001  
Vessel 41091  
Vessel 41301  
Sihi Vacuum Pump

All other equipment using Kodak water as a coolant shall operate with a maximum condenser coolant temperature of 25 degrees C.

(ii) If the operation of a condenser at the condenser coolant temperature specified above results in freezing and consequent plugging of the condenser, the allowable condenser coolant temperature may be raised to a maximum of 2° C above the freezing point of the volatile organic compound.

(iii) Kodak shall document the equipment with surface condensers being used and the condenser coolant temperature prior to the start of each production batch.

(iv) As determined in the 6NYCRR Part 212 VOC RACT evaluation dated September 24, 2010, the aggregate VOC emissions from both Part 212 sources and air dryers and production equipment exhaust systems subject to Part 233 from Emission Unit U-00060 shall not exceed 150 tpy (tons per year) on a rolling twelve-month basis.

(v) Records shall be maintained of the quantity of each pharmaceutical and cosmetic product manufactured (synthesized by chemical reaction), by identification number. The records shall be updated monthly and compiled into a 12 month rolling total. The methods of calculation shall be those described in Mass Balance Calculation Techniques for the Synthetic Chemicals Division (Copyright ©) by Eastman Kodak Company, 1991.

(vi) All of the pharmaceutical and cosmetic production during any given 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions shall be calculated by multiplying the number of batches of each pharmaceutical and cosmetic product made in that month by the calculated VOC emissions per batch.

(vii) Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or

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pending RACT evaluation. The next re-evaluation shall be submitted no later than September 30, 2015.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-88: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Replaces Condition(s) 472**

**Item 1-88.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-88.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The closed vent systems and control devices use to control Group 1 Halogen HAP processes in Emission Unit U-00060 are subject to the equipment leak record keeping requirements specified under §63.998(d)(4) of Subpart SS. Kodak shall maintain records of the following information for the closed vent system and control devices:

- (1) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams; the dates and descriptions of any changes in the design specifications; and a description of the parameter or parameters monitored to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. These records shall be retained for the life of the equipment.
- (2) Dates and durations when the closed vent systems and control devices required are not operated as designed as indicated by the monitored parameters; dates and durations during which the monitoring system or monitoring device is inoperative; and dates and durations of start-ups and shutdowns of required control devices. These records shall be retained for five years.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 469: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 469.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 469.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to Start-up, Shutdown, and Malfunction Record Keeping requirements specified under §63.998(d)(3) of Subpart SS. Kodak shall maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment used to comply with the MON MACT during which excess emissions occur. For each start-up, shutdown, and malfunction during which excess emissions occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing control device emissions to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 470: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 470.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 470.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.998(d)(5) of Subpart SS, Kodak shall record the occurrences and the cause of periods when the monitored parameters are outside of the parameter ranges documented in the Notification of Compliance Status report. This information shall also be reported in the Periodic Report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 471: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(e), Subpart FFFF**

**Item 471.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00060

Regulated Contaminant(s):

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**Item 471.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For HCl Scrubber Systems subject to the MON MACT, Kodak shall comply with the equipment leak record keeping requirements specified under §63.998(d)(4) of Subpart SS.

Kodak shall maintain the following records:

- (1) Dates and durations when the scrubber systems required are not operated as designed as indicated by the monitored parameters;
- (2) Dates and durations during which the monitoring system or monitoring device is inoperative; and
- (3) Dates and durations of start-ups and shutdowns of required control devices.

These records shall be retained for 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 473: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2450(k)(3), Subpart FFFF**

**Item 473.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 473.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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**Monitoring Description:**

In order to comply with the monitoring requirements of 40 CFR 63.2450(k)(3) for halogen scrubbers used to control only batch process vents, Kodak shall monitor and record the strength of caustic in the prescrubbers used in combination with scrubbers for the control of hydrogen halide and halide HAP from each Group 1 halogen HAP process as follows:

- Document the stoichiometrically required amount of caustic to be added to the prescrubber vessel;
- Specify in each affected process description the mass and concentration of caustic solution to be added to the prescrubber; and
- Document for each batch the mass and concentration of caustic solution in fact added to the prescrubber.

These records shall be retained for 5 years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 474: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2460(b), Subpart FFFF**

**Item 474.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 474.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**Monitoring Description:**

In order to satisfy the requirements for processes with batch process vents, Kodak must determine the group status of the batch process vents by determining and summing the uncontrolled organic HAP emissions from each of the batch process vents within the process using the SynChem MON MACT Estimating Model, based on the procedures specified in §63.1257(d)(2)(i) and (ii), except as specified in



paragraphs 2460(b)(1) through (7).

In order to meet the requirements of paragraph 63.2460(b)(4) for vessels equipped with a process condenser, Kodak must calculate the uncontrolled emissions by using the SynChem MON MACT Estimating Model as follows:

- (i) Kodak must determine the flowrate of gas (or volume of gas), partial pressures of condensables, temperature (T), and HAP molecular weight (MW HAP) at the exit temperature and exit pressure conditions of the condenser or at the conditions of the dedicated receiver.
- (ii) Kodak must assume that all of the components contained in the condenser exit vent stream are in equilibrium with the same components in the exit condensate stream (except for noncondensables).
- (iii) Kodak must perform a material balance for each component.
- (iv) Emissions from empty vessel purging shall be calculated using the exit temperature and exit pressure conditions of the condenser or the conditions of the dedicated receiver.
- (v) Kodak must conduct an engineering assessment for each emission episode that is not due to vapor displacement, purging, heating, depressurization, vacuum operations, gas evolution, air drying, or empty vessel purging.
- (vi) Kodak may elect to conduct an engineering assessment if it can demonstrate to the EPA that the MON MACT methods are not appropriate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 475: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2465(b), Subpart FFFF**

**Item 475.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 475.2:**

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If any process vents within a process emit hydrogen halide and halogen HAP, Kodak must determine and sum the uncontrolled hydrogen halide and halogen HAP emissions from each of the process vents within the process using the SynChem MON MACT Estimating Model in accordance with the procedures specified in §63.1257(d)(2)(i) and/or (ii), as appropriate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-89: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Replaces Condition(s) 478**

**Item 1-89.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-89.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for agitator seals shall be conducted in accordance with the requirements of §63.1028(c) of Subpart UU as follows:

a) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, Kodak shall monitor each agitator seal monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 parts per million or greater.

b) Excluding agitators equipped with a dual mechanical seal system that includes a barrier fluid system, each agitator seal shall be checked by visual inspection each calendar week for indications of liquids dripping from the agitator seal. Kodak shall document that the inspection

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was conducted and the date of the inspection. If there are indications of liquids dripping from the agitator seal at the time of the weekly inspection, prior to the next required inspection, Kodak shall:

- 1) Monitor the agitator seal using Method 21. If an instrument reading of 10,000 parts per million or greater is measured, a leak is detected and it shall be repaired;
- or
- 2) Eliminate the indications of liquids dripping from the agitator seal.

The following agitators are exempt from these monthly monitoring requirements:

- (1) Any agitator that is designed with no externally actuated shaft penetrating the agitator housing.
- (2) Any agitator that is routed to a process system that captures and transports leakage from the agitator to a control device.
- (3) Any agitator seal that is designated as difficult-to-monitor and Kodak monitors the agitator seal according to a written plan.
- (4) Any agitator seal that is obstructed by equipment or piping that prevents access to the agitator by a monitor probe.
- (5) Any agitator seal that is designated as unsafe-to-monitor and Kodak monitors the agitator seal according to a written plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 476: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 476.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

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

**Item 476.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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**Monitoring Description:**

Leak Detection and Repair (LDAR) monitoring for open-ended valves or lines shall be conducted in accordance with §63.1033(a) of Subpart UU.

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply at all other times.

Open-ended valves or lines in an emergency shutdown system that are designed to open automatically in the event of a process upset are exempt from these requirements.

Open-ended valves or lines containing materials that would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system are also exempt from these requirements.

**Monitoring Frequency:** AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

**Reporting Requirements:** SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 477: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2480, Subpart FFFF**

**Item 477.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 477.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Leak detection procedures for pumps shall be conducted in accordance with the requirements of §63.1026 of Subpart UU.

(a) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. Kodak shall document that the inspection was conducted and the date of the inspection.

If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, Kodak shall:

(1) Monitor the pump using Method 21. If the instrument reading indicates a leak, a leak is detected and it shall be repaired; or  
(2) Kodak shall eliminate the visual indications of liquids dripping.

(b) Kodak shall monitor each pump monthly to detect leaks by Method 21. The instrument reading that defines a leak is 10,000 ppmv for batch process pumps.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 479: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 479.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 479.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall monitor each valve at the intervals described



below to detect leaks by Method 21. The instrument reading that defines a leak is 500 parts per million or greater for all valves in gas and vapor service and in light liquid service.

In accordance with §63.1025(b) of Subpart UU, Kodak shall monitor valves for leaks at the following intervals:

(1) If at least the greater of 2 valves or 2 percent of the valves in a process unit leak Kodak shall monitor each valve once per month.

(2) At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, Kodak shall monitor each valve once each quarter. Monitoring data generated before the regulated source became subject to the MON MACT may be used to qualify initially for less frequent monitoring.

(3) At process units with less than 1 percent leaking valves, Kodak may elect to monitor each valve once every two quarters.

(4) At process units with less than 0.5 percent leaking valves, Kodak may elect to monitor each valve once every four quarters.

(5) At process units with less than 0.25 percent leaking valves, Kodak may elect to monitor each valve once every 2 years.

Kodak shall keep a record of the monitoring schedule for each process unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 480: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 480.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 480.2:**

Compliance Certification shall include the following monitoring:

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to leak repair schedules and record keeping in accordance with the requirements of §63.1024 of Subpart UU.

Each leak detected shall be repaired as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

For each leak detected, the following information shall be recorded and maintained for 5 years beyond the date of the last use of the equipment:

- (1) The date of first attempt to repair the leak.
- (2) The date of successful repair of the leak.
- (3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak if Kodak has developed a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
- (5) Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Condition 481: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 481.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

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

**Item 481.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak is subject to the requirements for identifying leaking equipment specified at §63.1023 of Subpart UU. When each equipment leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. The leak identification on a valve may be removed after it has been repaired and the valve has been monitored by Method 21 at least once within the first 3 months after its repair and no leak has been detected during that monitoring. The identification on pumps, agitators and connectors may be removed after it is repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 482: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 482.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

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

**Item 482.2:**

Compliance Certification shall include the following monitoring:

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Written plans for equipment monitoring, in accordance with the requirements of §63.1022(c)(4) in Subpart UU, shall be kept on site.

Kodak shall have a written plan that requires monitoring of equipment designated as unsafe-to-monitor as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment if a leak is detected.

Kodak shall have a written plan that requires monitoring of the equipment designated as difficult-to-monitor at least once per calendar year and repair of the equipment if a leak is detected.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 483: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 483.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 483.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements specified at §63.1022(b)(5) of Subpart UU, the identity, either by list, location (area or group), or other method, of equipment in regulated material service less than 300 hours per calendar year within a process unit or affected facilities subject to the MON MACT shall be recorded.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 484: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2480, Subpart FFFF**

**Item 484.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 484.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Equipment subject to the MON MACT shall be identified according to the requirements specified at §63.1022 in Subpart UU. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification, or by other appropriate methods. Note: Equipment includes - pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices used to meet the MON MACT requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 485: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 485.1:**

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 485.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Wastewaters, subject to the MON MACT requirements for wastewater maintenance procedures according to the applicability identified in Table 7 of Subpart FFFF, must be compliant with Subpart F, 63.105(b) and (c).

Kodak shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance).

The descriptions shall:

- (1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;
- (2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- (3) Specify the procedures to be followed when clearing materials from process equipment.

Kodak shall modify and update the information in the SCD maintenance wastewater plan (SCD SOP-0152) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 486: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 486.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 486.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.147 of Subpart G for wastewater record keeping.

Kodak shall keep in a readily accessible location the following records for all Group 2 wastewater streams:

- (1) Process unit identification and description of the process unit;
- (2) Stream identification code;
- (3) For existing sources, concentration of Table 9 compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration; and
- (4) Flow rate in liter per minute.

If Kodak uses process knowledge to determine the annual average concentration of a wastewater stream and/or uses process knowledge to determine the annual average flow rate, and determines that the wastewater stream is not a Group 1 wastewater stream, Kodak shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 487: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 487.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 487.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.136 of Subpart G for wastewater drain systems.

Each individual drain system that receives or manages a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream shall be inspected initially, and semi- annually thereafter, for improper work practices and control equipment failures. For individual drain systems, improper work practice includes, but is not limited to, leaving open any access hatch or other opening when such hatch or opening is not in use for sampling or removal, or for equipment inspection, maintenance, or repair.

For individual drain systems, control equipment failure includes, but is not limited to, any time a joint, lid, cover, or door has a gap or crack, or is broken. When an improper work practice or a control equipment failure is identified, first efforts at repair shall be made no later than 5 calendar days after identification and repair shall be completed within 15 calendar days after identification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 488: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 488.1:**

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 488.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.135 of Subpart G for process wastewater containers.

For containers with a capacity greater than or equal to 0.42 m<sup>3</sup> (~ 111 gallons), each container shall be inspected initially, and semi-annually thereafter, for improper work practices and control equipment failures. For containers, improper work practice includes, but is not limited to, leaving open any access hatch or other opening when such hatch or opening is not in use.

When an improper work practice or a control equipment failure is identified, first efforts at repair shall be made no later than 5 calendar days after identification and repair shall be completed within 15 calendar days after identification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 489: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485, Subpart FFFF**

**Item 489.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 489.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Monitoring Description:**

In accordance with Table 7 of this subpart, Kodak must comply with the requirements of section 63.135 of Subpart G for process wastewater containers.

For containers with a capacity greater than or equal to 0.42 m<sup>3</sup> (~ 111 gallons), a submerged fill pipe shall be used when a container is being filled by pumping with a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream. The submerged fill pipe outlet shall extend to no more than 6 inches or within two fill pipe diameters of the bottom of the container while the container is being filled. The cover shall remain in place and all openings shall be maintained in a closed position except for those openings required for the submerged fill pipe and for venting of the container to prevent physical damage or permanent deformation of the container or cover.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 490: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485(j), Subpart FFFF**

**Item 490.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 490.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak must determine the annual average concentration and annual average flow rate for wastewater streams for each MCPU. The procedures for flexible operation units do not apply for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 491: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 491.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 491.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water LDAR leak repair according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(d).

If a leak is detected, Kodak shall comply with the following requirements:

- (1) The leak shall be repaired as soon as practical but not later than 45 calendar days after Kodak receives results of monitoring tests indicating a leak. The leak shall be repaired unless Kodak demonstrates that the results are due to a condition other than a leak.
- (2) Once the leak has been repaired, Kodak shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown. All time periods shall be determined from the date when Kodak determines that delay of repair is necessary. If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.

If a shutdown is not expected within the next 2 months documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a



schedule for completing the repair as soon as practical. If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, Kodak may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. Kodak shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as follows:

- (1) Calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in Table 4 of 40CFR Part 63, Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. Kodak may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in Table 4; and
- (2) Determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

If repair is delayed for any other reasons, Kodak may delay repair up to a maximum of 120 calendar days. Kodak shall demonstrate that the necessary parts or personnel were not available.

Kodak shall retain the following records:

- (1) Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
- (2) Records of any leaks detected and the date the leak was discovered;
- (3) The dates of efforts to repair leaks; and
- (4) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

If Kodak invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported:

- (1) The presence of the leak and the date that the leak was detected;
- (2) Whether or not the leak has been repaired;
- (3) The reason(s) for delay of repair. If delay of repair is invoked because repair would cause greater emissions than the potential emissions from delaying repair, documentation of emissions estimates must also be submitted;
- (4) If the leak remains unrepaired, report the expected



**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



date of repair; and  
(5) If the leak is repaired, report the date the leak was successfully repaired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 492: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2490, Subpart FFFF**

**Item 492.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 492.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Heat Exchange Systems, subject to the MON MACT requirements for cooling water Leak Detection and Repair (LDAR) monitoring according to the applicability identified in Table 10 of Subpart FFFF, must be compliant with Subpart F, 63.104(a), (b) or (c).

For process condensers with cooling water, Kodak has elected to comply with 63.104(a) by operating each condenser with a minimum pressure on the cooling water side at least 35 kilopascals (5.1 psi) greater than the maximum pressure on the process side.

For reactor jackets with cooling water, Kodak has elected to comply with 63.104(c) by monitoring a surrogate indicator of heat exchange system leaks. Kodak shall:

1)prepare and implement a monitoring plan (SCD SOP-2444) that documents the procedures that will be used to detect leaks of process fluids from reactors into cooling water in the reactor jacket. The plan includes:



(i) A description of the parameter or condition to be monitored and an explanation of how the selected parameter or condition will reliably indicate the presence of a leak.

(ii) The parameter level(s) or conditions(s) that shall constitute a leak. This shall be documented by data or calculations showing that the selected levels or conditions will reliably identify leaks. The monitoring must be sufficiently sensitive to determine the range of parameter levels or conditions when the system is not leaking. When the selected parameter level or condition is outside that range, a leak is indicated.

(iii) The monitoring frequency which shall be no less frequent than monthly for the first 6 months and quarterly thereafter to detect leaks.

(iv) The records that will be maintained to document compliance with the requirements of this section.

(2) If a substantial leak is identified by methods other than those described in the monitoring plan and the method(s) specified in the plan could not detect the leak, the owner or operator shall revise the plan and document the basis for the changes. The owner or operator shall complete the revisions to the plan no later than 180 days after discovery of the leak.

(3) The owner or operator shall maintain, at all times, the monitoring plan that is currently in use. The current plan shall be maintained on-site, or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. If the monitoring plan is superseded, the owner or operator shall retain the most recent superseded plan at least until 5 years from the date of its creation. The superseded plan shall be retained on-site (or accessible from a central location by computer or other means that provides access within two hours after a request) for at least 6 months after its creation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 493: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 493.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 493.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(g), for a Continuous Parameter Monitoring System (CPMS) on process vents controlling Group 1 halogen HAP processes (Solution Flow Monitors and pH monitors on Emission Controls 30311, 30410 and 30415), Kodak shall keep the following records:

- (1) A record of the procedure used for calibrating the CPMS; and
- (2) The results of each calibration check and all maintenance performed on the CPMS must be recorded including, the date and time of completion of calibration and preventive maintenance of the CPMS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 494: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 494.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 494.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 40 CFR 63.2525(f), Kodak must keep a

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



record of each time a safety device (e.g. a pressure relief valve, rupture disc, fusible plug, or any other type of device which functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere ) is opened to avoid unsafe conditions during the manufacture of a MON covered process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 495: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 495.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 495.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(e), Kodak shall keep records for Group 2 Batch Process Vents as follows:

For Low Volume Group 2 processes with < 10,000 lb/yr OHAP usage Kodak must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the third paragraph below. After 1 year, Kodak may revert to recording only usage if the usage during the year is less than 10,000 lb.

For Mid Volume Group 2 processes with < 1,000 lb/yr OHAP emissions Kodak must keep records of the number of batches operated and calculate a daily rolling annual sum of

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batches operated no less frequently than monthly. If the number of batches operated results in organic HAP emissions that exceed 1,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the paragraph below. After 1 year, Kodak may revert to recording only the number of batches if the number of batches operated during the year results in less than 1,000 lb of organic HAP emissions.

For High Volume Group 2 processes with > 1,000 lb/yr OHAP emissions Kodak must keep the following records:

- (i) A record of the day each batch was completed and/or the operating hours per day for continuous operations with hydrogen halide and halogen emissions;
- (ii) A record of whether each batch operated was considered a standard batch;
- (iii) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch; and
- (iv) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 496: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2525, Subpart FFFF**

**Item 496.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 496.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c),

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Kodak must maintain a schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 497: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 497.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 497.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each operating scenario:

- (1) A description of the process and the type of process equipment used;
- (2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;
- (3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;
- (4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;
- (5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);
- (6) The applicable monitoring requirements and any parametric level that assures compliance for all emissions

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- routed to the control device or treatment process;
- (7) Calculations and engineering analyses required to demonstrate compliance; and
- (8) For reporting purposes, a change to any of these elements not previously reported, except for item (5) above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 498: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 498.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I24

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 498.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, Kodak shall operate and maintain scrubbers (Control Devices 30309, 30310, 30311 and 30312) as follows:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.
- 3) Operating and maintenance records, as well as a weekly



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log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.

4)Compliance testing using EPA Method 5 will be conducted at the discretion of the Department.

Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 7 pH (STANDARD) units  
Reference Test Method: EPA Method 5  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 499: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 499.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060  
Process: I25

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 499.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf (grains per dry standard cubic foot) particulate standard, the operator will verify that water is flowing to the control device (Control ID 30102) prior to startup of the process and once per shift while the process is in operation. This control device will be inspected and cleaned monthly and repaired if necessary. Inspection and maintenance records shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)





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Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 500: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 500.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I27

Emission Source: 304AA

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 500.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf (grains per dry standard cubic foot) particulate standard, Kodak shall utilize the scrubber (Control ID 30406) whenever Emission Source 304AA is operating in a clean-up mode. Before initiating a clean-up process, Kodak shall visually verify that water is flowing through the scrubber. The scrubber shall be cleaned and maintained on an annual basis. Records of maintenance, malfunctions and corrective actions will be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 501: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 501.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I27

Emission Source: 304AA

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Regulated Contaminant(s):  
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**Item 501.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf (grains per dry standard cubic foot) particulate standard, Kodak shall utilize the baghouse (Control ID 30407) whenever Emission Source 304AA is operating in a non-clean-up mode. This control device is equipped with an alarm which detects bag breaks. If the alarm should be activated, Kodak shall inspect the bag to verify that the bag has ruptured. If the bag has ruptured, the process shall be terminated and the bag shall be replaced.

Dust shall be removed from the baghouse weekly or whenever the hopper is full, whichever first occurs. Each bag shall be replaced at least once during every 2 year period, starting January 1, 2003. Records of maintenance, malfunctions and corrective actions will be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 502: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 502.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I27

Emission Source: 304AB

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 502.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf (grains per dry standard cubic foot) particulate standard, Kodak shall utilize the scrubber (Control ID 30404) whenever Emission Source 304AB is operating in a clean-up mode. Before initiating a clean-up process, Kodak shall visually verify that water is flowing through the scrubber. The scrubber shall be cleaned and maintained on an annual basis. Records of maintenance, malfunctions and corrective actions shall be kept on site for 5 years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 503: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 503.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I27

Emission Source: 304AB

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 503.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf (grains per dry standard cubic foot) particulate standard, Kodak shall utilize the baghouse (Control ID 30405) whenever Emission Source 304AB is operating in a non-clean-up mode. This control device is equipped with an alarm which detects bag breaks. If the alarm should be activated, Kodak shall inspect the bag to verify that the bag has ruptured. If the bag has ruptured, the process shall be terminated and the bag shall be replaced.

Dust shall be removed from the baghouse weekly or whenever

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the hopper is full, whichever first occurs. Each bag shall be replaced at least once during every 2 year period, starting January 1, 2003. Records of maintenance, malfunctions and corrective actions will be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 504: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 504.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I28

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 504.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, Kodak shall operate and maintain scrubbers (Control Devices 30412, 30413, 30414, 30415 and 30416) as follows:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.
- 3) Operating and maintenance records, as well as a weekly



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log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.

4)Compliance testing using EPA Method 5 will be conducted at the discretion of the Department.

Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 7 pH (STANDARD) units  
Reference Test Method: EPA Method 5  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 505: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)**

**Item 505.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060  
Process: I49

**Item 505.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 506: Compliance Certification**



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**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.5 (d)**

**Item 506.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I49

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 506.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 1-90: Overall requirements for subpart HHHHH  
Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.8000(a), Subpart HHHHH**

**Item 1-90.1:**

This Condition applies to Emission Unit: U-00060  
Process: I52

**Item 1-90.2:**

The facility must be in compliance with the emission limits and work practice standards in table 1-5 of subpart HHHHH at all times, except during periods of startup, shutdown, and malfunction.

The facility shall meet the requirements specified in §63.8000(b) and (c).

The facility must meet the requirements specified in §63.8005-8025 or meet the alternative means of compliance in §63.8050 - except as specified in §63.8000(d).

The facility must meet the notification, reporting, and recordkeeping requirements specified in §63.8070, 63.8075, and 63.8080.

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**Condition 1-91: Compliance Certification**  
Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.8015, Subpart HHHHH**

**Item 1-91.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Process: I52

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-91.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak shall comply with section 63.8015 requirements for equipment leaks, subject to the § 63.8015(b)(4) exclusions for equipment in service for less than 300 hours per year, equipment in vacuum service, and equipment contacting non-process fluids.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-92: Heat exchanger provisions - referral to HON rule**  
Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement:40CFR 63.8030, Subpart HHHHH**

**Item 1-92.1:**

This Condition applies to Emission Unit: U-00060

Process: I52

**Item 1-92.2:**

For each heat exchange system as defined in §63.101 of subpart F, the facility shall comply with the provisions listed in §63.104 of subpart F, except as provided in §63.8030(b)-(e).

**Condition 508: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement:6 NYCRR 231-2.2 (d) (3)**

**Item 508.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00060  
Process: I26

Emission Point: 303A8

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 508.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, annual emissions of volatile organic compounds (VOCs) from Emission Point 303A8 (Process I26) shall not exceed 12.5 tons per year (tpy) on a rolling 12 month basis. A log shall be kept at each process area that includes the batch description and number, date, contaminants emitted, and quantity of contaminants emitted. A summary log shall be prepared and updated monthly, consolidating the individual totals of contaminants emitted from each process area. The summary log shall provide monthly totals of VOC emitted. The data shall be presented in a chart, showing the twelve month cumulative emissions. Deviations from these conditions shall be reported promptly to the Department. Records shall be maintained on site for a period of 5 years and made available to the Department.

Parameter Monitored: VOC

Upper Permit Limit: 12.5 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 509: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 509.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060  
Process: I26

Emission Point: 303A8  
Emission Source: 303AE



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Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 509.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, Kodak shall operate and maintain the scrubber (Control Device 30304) as follows:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.
- 3) Operating and maintenance records, as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.
- 4) Compliance testing using EPA Method 5 will be conducted at the discretion of the Department.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 7 pH (STANDARD) units

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-93: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2465(c)(1), Subpart FFFF**

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**Replaces Condition(s) 510**

**Item 1-93.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 303X1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-93.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B303 Prescrubber Vessel 991 associated with emission sources ducted to Emission Point 303X1 shall be maintained and operated in conjunction with the B303 Building Scrubber (Control Device 30311) to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall verify prior to the start of each Group 1 process batch that the caustic/gas ratio is greater than 1.5 moles of NaOH per mole of Gas and that the total volume of liquid in the prescrubber vessel is greater than 350 gallons.

Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 350 gallons

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-94: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2465(c)(1), Subpart FFFF**

**Replaces Condition(s) 512**

**Item 1-94.1:**

The Compliance Certification activity will be performed for:



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Emission Unit: U-00060

Emission Point: 303X1

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 1-94.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B303 Building Scrubber (Control Device 30311) associated with emission sources ducted to Emission Point 303X1 shall be maintained and operated in conjunction with the B303 Prescrubber Vessel 991 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the scrubber solution pH.

Kodak shall use a pH monitoring device capable of providing a continuous record of the pH of the scrubber effluent to ensure that the scrubber solution pH is maintained above 8.3 at all times that Group 1 Halogen HAP processes are operating. The pH shall be recorded at the start of each Group 1 Halogen HAP process (per 63.2450(k)(3)). Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: PH

Lower Permit Limit: 8.3 pH (STANDARD) units

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-95: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2465(c)(1), Subpart FFFF**

**Replaces Condition(s) 511**

**Item 1-95.1:**

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Emission Unit: U-00060

Emission Point: 303X1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-95.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B303 Building Scrubber (Control Device 30311) associated with emission sources ducted to Emission Point 303X1 shall be maintained and operated in conjunction with the B303 Prescrubber Vessel 991 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the recirculating solution flow rate.

Kodak shall operate a flow meter capable of providing a continuous record of liquid flow at the scrubber influent. The flow rate of recirculating scrubber solution shall be maintained above 200 gallons per minute at all times that Group 1 Halogen HAP processes are operating.

The scrubber solution flow rate shall be monitored on a continuous basis (at least once per minute) and data shall be recorded on a 1-hour block average basis. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 200 gallons per minute

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 513: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 513.1:**



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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 303X2

Process: I26

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 513.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, annual emissions of volatile organic compounds (VOCs) from Emission Point 303X2 (Process I26) shall not exceed 6.8 tons per year (tpy) on a rolling 12 month basis. A log shall be kept at each process area that includes the batch description and number, date, contaminants emitted, and quantity of contaminants emitted. A summary log shall be prepared and updated monthly, consolidating the individual totals of contaminants emitted from each process area. The summary log shall provide monthly totals of VOC emitted. The data shall be presented in a chart, showing the twelve month cumulative emissions. Deviations from these conditions shall be reported promptly to the Department. Records shall be maintained on site for a period of 5 years and made available to the Department.

Parameter Monitored: VOC

Upper Permit Limit: 6.8 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 514: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 514.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 30403

Process: I27

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Regulated Contaminant(s):  
CAS No: 0NY998-00-0    VOC

**Item 514.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, annual emissions of volatile organic compounds (VOC) from Emission Point 30403 (which is part of Process I27) shall not exceed 81.0 tons per year (tpy) on a 12 month rolling basis. The sum of VOC emissions from chemical manufacturing and solvent cleaning operations shall be recorded for each month and incorporated into a 12-month rolling total.

Calculations for chemical manufacturing operations shall be based on:

- 1) Records for the quantity of each chemical manufactured (synthesized by chemical reaction) by identification number, and
- 2) Engineering calculations (using mass balance calculation techniques for the Synthetic Chemicals Division© by Eastman Kodak Company, 1991, or equivalent methods).

At a minimum, 90% of the total chemical production during any 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions for at least 90% of the total chemical production shall be calculated by multiplying the number of batches of each chemical made in that month by the calculated VOC emissions per batch. The total VOC emission shall be calculated by extrapolating the results on at least 90% of the total chemical production by the following formula:

$$\text{Total VOC emissions} = \text{VOC}(90)/P$$

Where:

Total VOC emissions = total VOC emission from all manufacturing operations

VOC(90) = VOC emissions from at least 90% of the total chemicals manufactured, and

P = weight proportion of the chemicals with calculated emissions (at least 90%) to all chemicals

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manufactured.

Emissions from solvent cleaning operations will be based on:

- 1) raw material usage records maintained for each portable cart wash fill station, and
- 2) an emission factor of 15% of the quantity of VOC solvent filled in the wash carts, unless otherwise determined by subsequent mass balance studies.

The validity of the engineering calculations used to demonstrate continuous compliance with the 81 tpy emission limit shall be demonstrated in accordance with the monitoring requirements specified under the permit condition for 6 NYCRR Part 212.10(c)(4)(iii) VOC RACT for EU U-00060.

Records shall be retained on site for five years and made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 81.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-96: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2465(a), Subpart FFFF**

**Replaces Condition(s) 516**

**Item 1-96.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-96.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63  
MON MACT for Group 1 Halogen HAP processes, the B304  
Building Scrubber (Control Device 30410) associated with

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emission sources ducted to Emission Point 304B0 shall be maintained and operated in conjunction with the B304 Prescrubber Vessel 1061 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the scrubber recirculating solution flow rate.

Kodak shall operate a flow meter capable of providing a continuous record of liquid flow at the scrubber influent. The flow rate of recirculating scrubber solution shall be maintained above 148 gallons per minute at all times that Group 1 Halogen HAP processes are operating.

The scrubber solution flow rate shall be monitored on a continuous basis (at least once per minute) and data shall be recorded on a 1-hour block average basis. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 148 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 515: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.2465(a), Subpart FFFF**

**Item 515.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 515.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63



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MON MACT for Group 1 Halogen HAP processes, the B304 Building Scrubber (Control Device 30410) associated with emission sources ducted to Emission Point 304B0 shall be maintained and operated in conjunction with the B304 Prescrubber Vessel 1061 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the scrubber solution pH.

Kodak shall maintain the scrubber solution pH above 8.2 at all times that Group 1 Halogen HAP processes are operating. The pH shall be recorded at the start of each Group 1 Halogen HAP process per 63.2450(k)(3). Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: PH

Lower Permit Limit: 8.2 pH (STANDARD) units

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 517: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2465(a), Subpart FFFF**

**Item 517.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 517.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B304 Prescrubber Vessel 1061 associated with emission sources ducted to Emission Point 304B0 shall be maintained and



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operated in conjunction with the B304 Building Scrubber (Control Device 30410) to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall verify prior to the start of each Group 1 process batch that the caustic/gas ratio is greater than 1.19 moles of NaOH per mole of Gas and that the total volume of liquid in the prescrubber vessel is greater than 614 gallons.

Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 614 gallons

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 518: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 518.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Process: I45

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 518.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, emissions of volatile organic compounds (VOCs) from emission point 304B0 shall be limited to 39.9 tpy (tons per year) on a 12 month rolling basis. The sum of VOC emissions from chemical manufacturing and solvent cleaning operations shall be



recorded for each month and incorporated into a 12 month rolling total.

Calculations for chemical manufacturing operations shall be based on

- 1) records for the quantity of each chemical manufactured (synthesized by chemical reaction) by identification number, and
- 2) engineering calculations (using mass balance calculation techniques for the Synthetic Chemicals Division© by Eastman Kodak Company, 1991, or equivalent methods).

At a minimum, 90% of the total chemical production during any 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly VOC emissions for at least 90% of the total chemical production shall be calculated by multiplying the number of batches of each chemical made in that month by the calculated VOC emissions per batch. The total VOC emissions shall be calculated by extrapolating the results on at least 90% of the total chemical production by the following formula:

$$\text{Total VOC emissions} = \text{VOC}(90)/P$$

Where:

Total VOC emissions = Total VOC emission from all manufacturing operations

VOC(90) = VOC emissions from at least 90% of the total chemicals manufactured, and

P= weight proportion of the chemicals with calculated emissions (at least 90%) to all chemicals manufactured.

Emissions from solvent cleaning operations will be based on

- 1) raw material usage records maintained for each portable cart wash fill station, and
- 2) an emission factor of 15% of the quantity of VOC solvent filled in the wash carts, unless otherwise determined by subsequent mass balance studies.

Records shall be maintained on site for a period of five years and made available to the Department.

Parameter Monitored: VOC

Upper Permit Limit: 39.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 519: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 519.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Process: I45

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 519.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, emissions of total particulate (liquid and solid) from emission point 304B0 shall be limited to 14.9 tpy (tons per year) on a rolling 12 month basis. For liquid particulates, the following documentation shall be maintained in order to demonstrate that the unconstrained potential to emit for liquid particulates is 2.44 tpy:

- 1) Emission monitoring data (performed on a similar source), and
- 2) PTE calculations for liquid particulates.

For solid particulate, records shall be maintained which show that emissions of solid particulate do not exceed 12.46 tpy. Solid particulate emission shall be calculated based on

- 1) Records of the quantity of solid powder added to the reactors,
- 2) A particulate loss rate of 0.5%, and
- 3) A scrubber efficiency of 67%.

The monthly quantity of solid particulate emissions shall be calculated by multiplying the total quantity of powders

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added to the reactor in that month by the particulate loss rate and by a scrubber factor of 0.33. Each month, the emissions will be incorporated into a 12 month rolling total.

Records shall be maintained on site for a period of five years and made available to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 14.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 520: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 520.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Process: I45

Emission Source: 30410

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 520.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf (dry standard cubic foot) particulate standard, Kodak shall monitor the flow rate of the scrubbing liquid to Control ID 30410 (a scrubber) on an hourly basis to ensure that a flow rate of greater than or equal to 150 gallons per minute is maintained when particulates are being handled. Based on testing data that may become available, this flow rate may be revised to demonstrate that the particulate standard is met.

At least once per year, this scrubber shall be inspected and standard preventative maintenance shall be performed as appropriate.



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Operating and maintenance records shall be maintained on site and made available to the Department upon request.

Compliance testing using EPA Method 5 will be conducted at the discretion of the Department.

Manufacturer Name/Model Number: Ceilcote Custom Design  
Parameter Monitored: VOLUMETRIC FLOW RATE  
Lower Permit Limit: 150 gallons per minute  
Monitoring Frequency: HOURLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 521: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 521.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060	Emission Point: 304B0
Process: I45	Emission Source: 30411

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 521.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf (dry standard cubic foot) particulate standard, Kodak shall visually verify on a weekly basis that the scrubbing solution is flowing in Control ID 30411 (a scrubber). If solution is not flowing, corrective action and/or standard preventative maintenance procedures will be performed as soon as possible.

At least once each year, the scrubber shall be inspected and standard preventative maintenance shall be performed as appropriate.

Operating and maintenance records shall be maintained on site and made available to the Department upon request.



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Compliance testing using EPA Method 5 will be conducted at the discretion of the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 522: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 522.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Process: I45

Emission Source: 30417

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 522.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with 40 CFR Part 64 Compliance Assurance Monitoring (CAM) requirements, the coolant outlet temperature of the vacuum pump condenser (Control ID 30417) shall be maintained at a maximum of 0 degrees centigrade while the auto filter dryer system is in use to process VOCs. All condenser components and temperature monitoring equipment will be maintained and calibrated according to manufacturing recommendations and local operating procedures. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 0 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

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**Condition 1-97: Compliance Certification**

Effective between the dates of 01/01/2015 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63.2465(a), Subpart FFFF**

**Replaces Condition(s) 523**

**Item 1-97.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304X1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-97.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B304 Building Scrubber (Control Device 30415) associated with emission sources ducted to Emission Point 304X1 shall be maintained and operated in conjunction with the B304 Prescrubber Vessel 531 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the recirculating solution flow rate.

Kodak shall operate a flow meter capable of providing a continuous record of liquid flow at the scrubber influent . The flow rate of recirculating scrubber solution shall be maintained above 200 gallons per minute at all times that Group 1 Halogen HAP processes are operating.

The scrubber solution flow rate shall be monitored on a continuous basis (at least once per minute) and data shall be recorded on a 1-hour block average basis. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 200 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.



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

**Condition 524: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement: 40CFR 63.2465(a), Subpart FFFF**

**Item 524.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060                      Emission Point: 304X1

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

**Item 524.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B304 Building Scrubber (Control Device 30415) associated with emission sources ducted to Emission Point 304X1 shall be maintained and operated in conjunction with the B304 Prescrubber Vessel 531 to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall monitor and record the scrubber solution pH.

Kodak shall maintain the scrubber solution pH above 8.3 at all times that Group 1 Halogen HAP processes are operating. The pH shall be recorded at the start of each Group 1 Halogen HAP process (per 63.2450(k)(3)). Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: PH

Lower Permit Limit: 8.3 pH (STANDARD) units

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 525: Compliance Certification**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2465(a), Subpart FFFF**

**Item 525.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00060

Emission Point: 304X1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 525.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with requirements of 40 CFR Part 63 MON MACT for Group 1 Halogen HAP processes, the B304 Prescrubber Vessel 531 associated with emission sources ducted to Emission Point 304X1 shall be maintained and operated in conjunction with the B304 Building Scrubber (Control Device 30415) to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. In order to demonstrate compliance with this requirement, Kodak shall verify prior to the start of each Group 1 process batch that the caustic/gas ratio is greater than 1.5 moles of NaOH per mole of Gas and that the total volume of liquid in the prescrubber vessel is greater than 350 gallons.

Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 350 gallons

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 527: Compliance Certification**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 527.1:**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



The Compliance Certification activity will be performed for:

Emission Unit: U-00075

Emission Point: 08224

**Item 527.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES

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Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 528: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 528.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00075

Emission Point: 08224

**Item 528.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is

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inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-98: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 1-98.1:**

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

Emission Unit: U-00083	Emission Point: 082X8
Process: Y14	Emission Source: 082BM
Emission Unit: U-00083	Emission Point: 205C5
Process: Y14	Emission Source: 205CX

**Item 1-98.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard

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continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-99: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 1-99.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00083	Emission Point: 08138
Process: Y10	Emission Source: 081BJ

**Item 1-99.2:**  
Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-100: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 1-100.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00083	Emission Point: 08138
Process: Y10	Emission Source: 081BJ

**Item 1-100.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-101: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 1-101.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00083  
Process: Y14

Emission Point: 082X8  
Emission Source: 082BM





**Item 1-101.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-102: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 1-102.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00083                      Emission Point: 205C5  
Process: Y14                                      Emission Source: 205CX

Regulated Contaminant(s):  
CAS No: 0NY075-00-0      PARTICULATES

**Item 1-102.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 6 NYCRR Part 212.4(c) particulate limit of 0.050 grains/dscf, the pressure drop across the dust collector (Control Device 20514) will be continuously monitored and maintained between 0.1 and 5.0 inches of water. The filter cartridges shall be automatically cleaned via pneumatic pulse solenoid valves in order to maintain the proper operating pressure drop. Data shall be recorded at least once per hour. Records of pressure drop and cartridge changes shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 0.1 inches of water

Upper Permit Limit: 5.0 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-103: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 1-103.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

**Item 1-103.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission Unit U-00084 includes emission sources which are permitted under more than one operating scenario. These operating scenarios are defined by Processes G01, G07, G08, G09 and G10. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 530: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 530.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00084  
Process: G05

Emission Point: 308B7

Emission Unit: U-00084  
Process: G05

Emission Point: 308B8

Emission Unit: U-00084  
Process: G06

Emission Point: 308C2

Emission Unit: U-00084

Emission Point: 059K6

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Process: G06	Emission Source: 059BC
Emission Unit: U-00084 Process: G07	Emission Point: 308C2
Emission Unit: U-00084 Process: G07	Emission Point: 308C3
Emission Unit: U-00084 Process: G08	Emission Point: 308C2
Emission Unit: U-00084 Process: G08	Emission Point: 308C3

**Item 530.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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



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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 531: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 531.1:**

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

Emission Unit: U-00084 Process: G05	Emission Point: 308B7
Emission Unit: U-00084 Process: G05	Emission Point: 308B8
Emission Unit: U-00084 Process: G06	Emission Point: 308C2
Emission Unit: U-00084 Process: G06	Emission Point: 059K6 Emission Source: 059BC
Emission Unit: U-00084 Process: G07	Emission Point: 308C2
Emission Unit: U-00084 Process: G07	Emission Point: 308C3
Emission Unit: U-00084 Process: G08	Emission Point: 308C2
Emission Unit: U-00084 Process: G08	Emission Point: 308C3

**Item 531.2:**

Compliance Certification shall include the following monitoring:

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Facility DEC ID: 8261400205



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-104: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-104.1:**

The Compliance Certification activity will be performed for the facility:

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The Compliance Certification applies to:

Emission Unit: U-00084  
Process: G08

Emission Unit: U-00084  
Process: G09

Emission Unit: U-00084  
Process: G10

**Item 1-104.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

Subpart must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are

used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC

solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection

procedures require operational access. This provision does not apply

to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These

devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface

coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and

VOC solvents; and

(g) clean hand held spray guns by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when

not in use;

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- (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
- (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 536: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Item 536.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 536.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, the annual emissions of VOC from Emission Source 308AA, as well as all emission sources in Process G05\* shall not exceed 39.9 tons per year on a rolling twelve month basis. Monthly emissions shall be calculated as follows:



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Monthly Emissions of VOC = A + B + C + D - E - F  
where,

A = Total quantity of VOC contained in coating solutions which were prepared outside the DPC Facility and brought into the DPC Facility during the month

B = Total quantity of VOC used by the DPC Facility to prepare coating solutions within the DPC Facility during the month

C = Total quantity of VOC contained in the inventory of cleaning solutions used by the DPC Facility at the beginning of the month

D = Total quantity of VOC added to the inventory of cleaning solutions used by the DPC Facility during the month

E = Total quantity of VOC contained in coating solutions which were returned to the customer or discarded as liquid waste by the DPC Facility during the month

F = Total quantity of VOC contained in the inventory of cleaning solutions used by the DPC Facility at the end of the month

Records shall be retained on site for five years and made available to the Department's representatives upon request.

\* Note: This project reflected the construction of the B-308 Digital Pilot coating facility (located on the first floor of B-308), authorized by the NYSDEC under a State Facility permit in 2002. Emission Sources 308AB & 308AC were also part of this New Source Review project, however, were accounted for in this emission cap limitation. Emission Source 308AC is not capable of emitting VOC, and Emission Source 308AB has a maximum emission rate potential of less than 0.08 tons per year VOC. This results in an effective cap of 39.98 tons per year for the project.

Parameter Monitored: VOC

Upper Permit Limit: 39.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-105: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 40CFR 63.829(f), Subpart KK**



**Replaces Condition(s) 537**

**Item 1-105.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-105.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The DPC Coating Machine (Emission Source 308AA) is currently operated as an R&D machine. The following condition will become effective if the DPC Coating Machine (1) is used to manufacture products for commercial sale via rotogravure printing, AND (2) the quantity of products manufactured for commercial sale (whether by rotogravure printing or web coating) is in excess of a de minimis quantity (i.e. 5%).

In order to demonstrate that the rotogravure printing operations performed by the DPC Coating Machine (Emission Source 308AA) meet the criteria of §63.821(a)(2)(ii), and are eligible to be excluded from the requirements of 40 CFR Subpart KK, Kodak shall demonstrate on a monthly basis that the total mass of materials applied using the rotogravure printing station do not exceed 5% of the total mass of materials applied on the entire coating machine.

In accordance with §63.829(f), Kodak shall maintain the following records:

- (1) The total mass of each material (inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials) applied each month on the coating machine, and
- (2) The total mass of each material (inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials) applied each month on the coating machine by rotogravure printing operations.

Records shall be retained on site for five years and made available to the Department's representative upon request.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Facility DEC ID: 8261400205

Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 538: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 227-1.3 (a)**

**Item 538.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Process: G02

Emission Source: 308AB

**Item 538.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute block period per hour of not more than 27 percent opacity.  
The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. The stationary combustion installation(s) subject to this condition shall be fired only with natural gas.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-106: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-106.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Process: G08

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 1-106.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-107: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (3)**

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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Item 1-107.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Process: G08

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 1-107.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings applied to paper film and foil may not use coatings with VOC contents, as applied, which exceed 0.08 kgVOC/kg coating (or 0.08 lbVOC/lb coating).

In accordance with 6 NYCRR 228-1.3(b)(1), the following records must be maintained and, upon request, provided to the Department:

1. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating,
2. Purchase, usage, and/or production records of the coating material including solvents.
3. Any other parameters used to verify compliance.

These records shall be updated prior to running any formulation changes in production.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 pounds of VOC per pound of coating

Reference Test Method: Method 24 ( or other approved method)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-108: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

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

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Facility DEC ID: 8261400205



**Item 1-108.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Process: G09

**Item 1-108.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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



**Condition 1-109: Compliance Certification**

Effective between the dates of 01/01/2015 and 12/31/2016

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

**Item 1-109.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Process: G10

**Item 1-109.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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



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Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-110: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-110.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084  
Process: G10

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 1-110.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A less restrictive emission rate has been established for this source per 6 NYCRR Part 228-1.5(e). The less restrictive emission rate applies to coatings used on the DPC Machine under Process G10 that contain greater than 2.9 lbs VOC/ regulated gallon of coating.

In order to maintain compliance with 6 NYCRR Part 228-1 VOC RACT (Reasonably Available Control Technology) requirements, the total annual emissions of VOC from non-compliant coatings used on the Digital Pilot Coating (DPC) machine (Emission Point 308B5) shall not exceed 35 tons per year on a rolling 12-month basis, as determined by the most recent RACT Evaluation, dated September 2010.

To demonstrate compliance with the 35 tpy limit, monthly emissions of VOCs shall be calculated to include the non-compliant DPC coatings vented to EP 308B5, as follows:

Monthly Emissions of VOC = A' + B' - E'  
where,

A' = Total quantity of VOC contained in non-compliant coating solutions which were prepared outside the DPC Facility and brought into the DPC Facility during the



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month

B' = Total quantity of VOC used by the DPC Facility to prepare non-compliant coating solutions within the DPC Facility during the month

E' = Total quantity of VOC contained in non-compliant coating solutions which were returned to the customer or discarded as liquid waste by the DPC Facility during the month.

Records shall be retained on site for five years and made available to the Department's representative upon request.

The RACT determination shall be re-evaluated every five years. The next such re-evaluation report shall be submitted prior to September 30, 2015.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-111: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 231-2.2 (d) (3)**

**Replaces Condition(s) 364**

**Item 1-111.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084

Emission Point: 08212

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-111.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to limit emissions below applicability thresholds of both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231 New Source Review (NSR) requirements, the total emissions of volatile organic compounds (VOC) from the CS coating machine (ES 082AJ) shall not exceed 38.7 tons per year on a rolling 12 month basis. Emissions calculations shall be based on the quantity of VOCs delivered to the coating machine.

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Records shall be kept on site and made available for inspection upon request by the Department.

Parameter Monitored: VOC  
Upper Permit Limit: 38.7 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 541: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)**

**Item 541.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00084                      Emission Point: 308B7  
Process: G05

Regulated Contaminant(s):  
CAS No: 0NY998-00-0      VOC

**Item 541.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212 VOC RACT (Reasonably Available Control Technology) requirements, the total annual emissions of (1) Part 212-regulated VOC from support operations associated with the Digital Pilot Coating (DPC) Machine (Emission Point 308B7) and (2) Part 228-1-regulated VOCs and Part 228-1 exempt VOCs from all coatings used on the DPC Machine (Emission Point 308B5) shall not exceed 35 tons per year on a rolling 12-month basis, as determined by the most recent RACT Evaluation, dated September 2010.

To demonstrate compliance with the 35 tpy limit, monthly emissions of VOCs shall be calculated to include both the DPC support operations vented to EP 308B7 and the DPC coatings vented to EP 308B5, as follows:

Monthly Emissions of VOC = A + B + C + D - E - F  
where,

A = Total quantity of VOC contained in coating solutions which were prepared outside the DPC Facility and brought



into the DPC Facility during the month

B = Total quantity of VOC used by the DPC Facility to prepare coating solutions within the DPC Facility during the month

C = Total quantity of VOC contained in the inventory of cleaning solutions used by the DPC Facility at the beginning of the month

D = Total quantity of VOC added to the inventory of cleaning solutions used by the DPC Facility during the month

E = Total quantity of VOC contained in coating solutions which were returned to the customer or discarded as liquid waste by the DPC Facility during the month

F = Total quantity of VOC contained in the inventory of cleaning solutions used by the DPC Facility at the end of the month

Note: This calculation methodology is conservative in that it includes emissions from other sources.

Records shall be retained on site for five years and made available to the Department's representative upon request.

The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending RACT evaluation. The next such re-evaluation report shall be submitted no later than September 30, 2015.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-112: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-112.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00085

**Item 1-112.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission Unit U-00085 includes emission sources which are

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permitted under more than one operating scenario. These operating scenarios are defined by Processes S15, S21 and S29. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-113: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 1-113.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00085  
Process: S23

Emission Point: 059K5  
Emission Source: 059AN

Emission Unit: U-00085  
Process: S23

Emission Point: 059K0  
Emission Source: 059AT

Emission Unit: U-00085  
Process: S23

Emission Point: 059K4  
Emission Source: 059AZ

**Item 1-113.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the



performance of a Method 5 emissions evaluation at any time.

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

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

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

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-114: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 1-114.1:**  
The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00085

Emission Point: 059K5

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Process: S23	Emission Source: 059AN
Emission Unit: U-00085	Emission Point: 059K0
Process: S23	Emission Source: 059AT
Emission Unit: U-00085	Emission Point: 059K4
Process: S23	Emission Source: 059AZ

**Item 1-114.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.



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The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-115: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-115.1:**

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

Emission Unit: U-00085  
Process: S21

Emission Unit: U-00085  
Process: S29

**Item 1-115.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line,  
the owner or operator of a facility subject to this  
Subpart must:

(a) use closed, non-leaking containers to store or dispose  
of cloth or other absorbent applicators impregnated with  
VOC solvents that are

used for surface preparation, cleanup or coating  
removal;

(b) store in closed, non-leaking containers spent or fresh  
VOC

solvents to be used for surface preparation, cleanup or  
coating removal;

(c) not use VOC solvents to cleanup spray equipment unless  
equipment is used to collect the cleaning compounds and to  
minimize VOC evaporation;

(d) not use open containers to store or dispense surface  
coatings and/or inks unless production, sampling,  
maintenance or inspection

procedures require operational access. This provision does  
not apply

to the actual device or equipment designed for the purpose  
of applying a coating material to a substrate. These  
devices may include, but are not limited to: spray guns,  
flow coaters, dip tanks, rollers, knife coaters, and  
extrusion coaters;

(e) not use open containers to store or dispose of spent  
surface

coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of

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- coatings and  
VOC solvents; and  
(g) clean hand held spray guns by one of the  
following:  
(1) an enclosed spray gun cleaning system that is kept  
closed when  
not in use;  
(2) non-atomized discharge of VOC solvent into a paint  
waste container that is kept closed when not in use;  
(3) disassembling and cleaning of the spray gun in a vat  
that is kept closed when not in use; or  
(4) atomized spray into a paint waste container that is  
fitted with a device designed to capture atomized VOC  
solvent emissions.

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-116: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (3)**

**Item 1-116.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00085

Process: S21

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-116.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:



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Coatings applied to paper film and foil may not use coatings with VOC contents, as applied, which exceed 0.08 kgVOC/kg coating (or 0.08 lbVOC/lb coating).

In accordance with 6 NYCRR 228-1.3(b)(1), the following records must be maintained and, upon request, provided to the Department:

1. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating,
2. Purchase, usage, and/or production records of the coating material including solvents.
3. Any other parameters used to verify compliance.

These records shall be updated prior to running any formulation changes in production.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 pounds of VOC per pound of coating

Reference Test Method: Method 24 ( or other approved method)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-117: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-117.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00085

Process: S29

**Item 1-117.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to

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perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

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

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

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-118: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

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

**Item 1-118.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00085	Emission Point: 059K4
Process: S21	Emission Source: 059AX

**Item 1-118.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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**Monitoring Description:**

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

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

**Condition 1-119: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Replaces Condition(s) 583**

**Item 1-119.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

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Emission Unit: U-00087 Process: N10	Emission Point: 349A5 Emission Source: 349AJ
Emission Unit: U-00087 Process: N10	Emission Point: 349F0 Emission Source: 349BL
Emission Unit: U-00087 Process: N10	Emission Point: 349F1 Emission Source: 349BP
Emission Unit: U-00087 Process: N10	Emission Point: 349F2 Emission Source: 349BS
Emission Unit: U-00087 Process: N10	Emission Point: 349D0 Emission Source: 349BZ
Emission Unit: U-00087 Process: N10	Emission Point: 349D3 Emission Source: 349CB
Emission Unit: U-00087 Process: N10	Emission Point: 349D4 Emission Source: 349CC
Emission Unit: U-00087 Process: N10	Emission Point: 349D6 Emission Source: 349CF
Emission Unit: U-00087 Process: N10	Emission Point: 349F3 Emission Source: 349CG
Emission Unit: U-00087 Process: N10	Emission Point: 349D7 Emission Source: 349CJ
Emission Unit: U-00087 Process: N10	Emission Point: 349F0 Emission Source: 349CM
Emission Unit: U-00087 Process: N10	Emission Point: 349F0 Emission Source: 349CN
Emission Unit: U-00087 Process: N10	Emission Point: 349F5 Emission Source: 349CQ
Emission Unit: U-00087 Process: N10	Emission Point: 349F6 Emission Source: 349EM
Emission Unit: U-00087 Process: N10	Emission Point: 349F7 Emission Source: 349EP
Emission Unit: U-00087 Process: N10	Emission Point: 349F8 Emission Source: 349ER
Emission Unit: U-00087 Process: N10	Emission Point: 349F9 Emission Source: 349ES

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Emission Unit: U-00087  
Process: N10

Emission Point: 349J3  
Emission Source: 349EU

Emission Unit: U-00087  
Process: N10

Emission Point: 349J5  
Emission Source: 349EX

Emission Unit: U-00087  
Process: N10

Emission Point: 349J6  
Emission Source: 349EY

Emission Unit: U-00087  
Process: N41

Emission Point: 349G5  
Emission Source: 349DE

**Item 1-119.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

Records of these verifications, investigations and corrective actions will be kept on-site.

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Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-120: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Replaces Condition(s) 584**

**Item 1-120.1:**

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

Emission Unit: U-00087  
Process: N10

Emission Unit: U-00087                      Emission Point: 349G5  
Process: N41                                      Emission Source: 349DE

Emission Unit: U-00087  
Process: N44

**Item 1-120.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-121: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Replaces Condition(s) 585**

**Item 1-121.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00087  
Process: N10

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-121.2:**  
Compliance Certification shall include the following monitoring:

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

Monitoring Description:  
In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c) and to

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comply with 40 CFR 64 Compliance Assurance Monitoring (CAM) for Emission Points 349E5 and 349E6, emissions from the sources listed below shall be controlled with the control devices listed below. The control devices will be equipped and operated with leak detectors. Each leak detector shall be alarmed to the control room. If an alarm is received, a visual inspection will be made to determine the cause of the alarm. Visual inspections shall be conducted as soon as practical, but no later than one (1) hour after the alarm is received. If a leak is detected by visual inspection, the source will be shutdown and necessary repairs shall be made before resuming operation.

Emission Source / Control Device / Emission Point  
ES 349AT / Control Device 34908 / EP 349B8  
ES 349BG / Control Device 34966 / EP 349B5  
ES 349BH / Control Device 34968 / EP 349E2  
ES 349BJ / Control Device 34969 / EP 349B6  
ES 349BK / Control Device 34971 / EP 349E3  
ES 349BM / Control Device 34973 / EP 349B7  
ES 349BN / Control Device 34975 / EP 349E4  
ES 349BQ / Control Device 34916 / EP 349C2  
ES 349BR / Control Device 34930 / EP 349E5  
ES 349BT / Control Device 34920 / EP 349C3  
ES 349BU / Control Device 34921 / EP 349E6  
ES 349BV / Control Device 34925 / EP 349C8  
ES 349BW / Control Device 34926 / EP 349E7  
ES 349BX / Control Device 34927 / EP 349C9  
ES 349BY / Control Device 34928 / EP 349E8  
ES 349CD / Control Device 34980 / EP 349D5  
ES 349CE / Control Device 34981 / EP 349E9  
ES 349ET / Control Device 34996 / EP 349J2  
ES 349EW / Control Device 34972 / EP 349J4

Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records of alarms, inspection results, and filter replacements shall be maintained on site and made available to the Department upon request.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Reference Test Method: Method 5  
Monitoring Frequency: SEMI-ANNUALLY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).



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**Condition 586: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)**

**Item 586.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087

Process: N40

Emission Source: 349DA

**Item 586.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 587: Compliance Certification**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable Federal Requirement:6 NYCRR 229.5 (d)**

**Item 587.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087

Process: N40

Emission Source: 349DA

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 587.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must

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maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 12 calendar month(s).

**Condition 588: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)**

**Item 588.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087  
Process: N43

**Item 588.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 589: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.5 (d)**

**Item 589.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087  
Process: N43

Regulated Contaminant(s):

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CAS No: 0NY998-00-0    VOC

**Item 589.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 12 calendar month(s).

**Condition 590:    Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 590.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087

Emission Point: 349D2

Process: N10

Emission Source: 349CA

Regulated Contaminant(s):

CAS No: 0NY075-00-0    PARTICULATES

**Item 590.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c) and to comply with 40 CFR 64 Compliance Assurance Monitoring (CAM), emissions from the Developer Manufacturing Equipment (ES 349CA) shall be controlled with a wet scrubber (Control Device 34976). The flow rate of recycled water to the scrubber shall be maintained at or above 145 gpm. The flow rate shall be monitored and recorded weekly. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site and made available for review upon request by the Department.



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Parameter Monitored: VOLUMETRIC FLOW RATE  
Lower Permit Limit: 145 gallons per minute  
Monitoring Frequency: WEEKLY  
Averaging Method: AVERAGING METHOD - SEE MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 591: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 591.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087	Emission Point: 349E0
Process: N10	Emission Source: 349CK

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 591.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, the cartridge filter (Control Device 34994) will be inspected semiannually and replaced on an annual basis or sooner if necessary. Inspection and maintenance records shall be kept on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 592: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

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**Item 592.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087  
Process: N44

Emission Point: 349H4  
Emission Source: 349EG

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 592.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c) and to comply with 40 CFR 64 Compliance Assurance Monitoring (CAM) for Emission Point 349H4, emissions from Emission Source 349EG shall be controlled with a dust collector (Control Device 34988). The dust collector will be equipped and operated with a leak detector. The leak detector shall be alarmed to the control room. If an alarm is received, a visual inspection will be made to determine the cause of the alarm. Visual inspections shall be conducted as soon as practical, but no later than one (1) hour after the alarm is received. If a leak is detected by visual inspection, the source will be shutdown and necessary repairs shall be made before resuming operation.

Monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and local operating procedures. Records of alarms, inspection results, and filter replacements shall be maintained on site and made available to the Department upon request.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: SEMI-ANNUALLY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 593: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

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**Item 593.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00087

Emission Point: 349H9

Process: N44

Emission Source: 349EL

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 593.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c) and to comply with 40 CFR 64 Compliance Assurance Monitoring (CAM), emissions from the Local Exhaust System for Dry Material Feeding and Handling Operations (ES 349EL) shall be controlled with a wet dynamic separator (Control Device 34993) and shall be operated and maintained as follows:

1) Upon start-up of the source (ES 349EL), the dynamic separator (Control Device 34993) will be operated with a minimum pressure drop of 4 inches of water and a maximum pressure drop of 8 inches of water. If the pressure falls outside this stated range, dry material feeding & handling operations (ES 349EL) shall cease immediately and maintenance shall be performed.

2) At least once per year, the dynamic separator shall be inspected and standard preventative maintenance shall be performed as appropriate.

3) Operating and maintenance records shall be kept on site and made available to the Department upon request. For Emission Point 349H9 to comply with 40 CFR 64 (CAM), pressure monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures.

4) Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 4 inches of water

Upper Permit Limit: 8 inches of water

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



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DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 594: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2485(j), Subpart FFFF**

**Item 594.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00089

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 594.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Kodak must determine the annual average concentration and annual average flow rate for wastewater streams for each MCPU. The procedures for flexible operation units do not apply for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 595: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 595.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00089

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 595.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(c), Kodak must maintain a schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 596: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 596.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00089

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 596.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(b), Kodak must maintain the following records of each operating scenario:

- (1) A description of the process and the type of process equipment used;
- (2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard; wastewater point of determination (POD); storage tanks; and transfer racks;
- (3) The applicable control requirements, including the level of required control, and for vents, the level of control for each vent;
- (4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device;
- (5) The process vents, wastewater POD, transfer racks, and



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storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s);

(6) The applicable monitoring requirements and any parametric level that assures compliance for all emissions routed to the control device or treatment process;

(7) Calculations and engineering analyses required to demonstrate compliance; and

(8) For reporting purposes, a change to any of these elements not previously reported, except for item (5) above, constitutes a new operating scenario.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 597: Compliance Certification**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable Federal Requirement:40CFR 63.2525, Subpart FFFF**

**Item 597.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00089

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 597.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the requirements of 40 CFR 63.2525(e), Kodak shall keep records for Group 2 Batch Process Vents as follows:

For Low Volume Group 2 processes with < 10,000 lb/yr OHAP usage Kodak must keep records of the amount of HAP material used, and calculate the daily rolling annual sum of the amount used no less frequently than monthly. If a record indicates usage exceeds 10,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the third paragraph below. After 1 year, Kodak may revert to recording only usage if the usage during the year is less than 10,000 lb.

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For Mid Volume Group 2 processes with < 1,000 lb/yr OHAP emissions Kodak must keep records of the number of batches operated and calculate a daily rolling annual sum of batches operated no less frequently than monthly. If the number of batches operated results in organic HAP emissions that exceed 1,000 lb/yr, Kodak must estimate emissions for the preceding 12 months based on the number of batches operated and the estimated emissions for a standard batch, and Kodak must begin recordkeeping as specified in the paragraph below. After 1 year, Kodak may revert to recording only the number of batches if the number of batches operated during the year results in less than 1,000 lb of organic HAP emissions.

For High Volume Group 2 processes with > 1,000 lb/yr OHAP emissions Kodak must keep the following records:

- (i) A record of the day each batch was completed and/or the operating hours per day for continuous operations with hydrogen halide and halogen emissions;
- (ii) A record of whether each batch operated was considered a standard batch;
- (iii) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch; and
- (iv) Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

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

**Condition 1-122: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 1-122.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00089  
Process: S11

Emission Point: 082X6

**Item 1-122.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-123: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 1-123.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00089  
Process: S11

Emission Point: 082X6  
Emission Source: 082CA



**Item 1-123.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-124: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 1-124.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00090	Emission Point: 326C5
Process: Z01	Emission Source: 326BK
Emission Unit: U-00090	Emission Point: 326D3
Process: Z01	Emission Source: 326BX
Emission Unit: U-00090	Emission Point: 326D3
Process: Z01	Emission Source: 326BY

**Item 1-124.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that

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particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-125: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 1-125.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00090 Process: Z01	Emission Point: 326C5 Emission Source: 326BK
Emission Unit: U-00090 Process: Z01	Emission Point: 326D3 Emission Source: 326BX
Emission Unit: U-00090 Process: Z01	Emission Point: 326D3 Emission Source: 326BY

**Item 1-125.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The



Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-126: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 234.5**

**Item 1-126.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00090  
Process: Z02

**Item 1-126.2:**  
Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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. The prohibition of this section shall apply to all written or oral contracts under the terms of which a coating, ink or adhesive is to be applied to a substrate.

This prohibition shall not apply to the following:

- (1) Ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or
- (2) Ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section 234.3(f) of this Part.

A person selling an ink, coating, or adhesive used in a printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-127: Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 1-127.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00090

Process: Z02

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-127.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to this Part



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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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-128: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 1-128.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00090

Process: Z02

**Item 1-128.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the department, and upon request, submitted to the department. Any other information required to determine compliance with this Part must be provided to the department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to



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the department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-129: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)**

**Item 1-129.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00090

Process: Z03

**Item 1-129.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-130: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 229.5 (d)**

**Item 1-130.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00090

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Process: Z03

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 1-130.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

Subsequent reports are due every 12 calendar month(s).

**Condition 1-131:    Compliance Certification**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement:6 NYCRR 234.8**

**Item 1-131.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00090

Emission Point: 326C6

Process: Z02

Emission Source: 326BN

**Item 1-131.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 10 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.



The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 4/1/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-132: Compliance Certification**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (i)**

**Item 1-132.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00090                      Emission Point: 326C7

Regulated Contaminant(s):  
CAS No: 0NY998-00-0      VOC

**Item 1-132.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212 emission control requirements for VOCs (81%), Kodak shall maintain the water flow rate to each of the two scrubbers (Control Device 32622) at or above 15 gal/min on an average hourly basis with up to 4 plating lines operating. The scrubber flow rates shall be recorded a minimum of

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once per minute while the process is in operation. The flow monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and established operations procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 15 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1  
MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 4/1/2015.

Subsequent reports are due every 6 calendar month(s).



**STATE ONLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**  
**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Emergency Defense - 6 NYCRR 201-1.5**

An emergency constitutes an affirmative defense to an action brought 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 and/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;
  - (3) During the period of the emergency the facility owner and/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 and/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 and/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: 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.

#### **STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 598: Reporting Requirements for State-Only Enforceable Conditions**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:ECL 19-0301**

**Item 598.1:**

Notwithstanding the reporting requirements found at Condition #6 of this Permit, for those state - only enforceable conditions with a reporting requirement of "Upon request by regulatory agency", the permittee is not obligated to include a statement regarding monitoring, record keeping, or deviations in the semi annual report. Nothing contained in this paragraph shall impair or prejudice any rights the Department may have to seek information from the permittee regarding compliance with the state - only enforceable conditions.

**Condition 599: Contaminant List**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:ECL 19-0301**

**Item 599.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000062-53-3

Name: ANILINE

CAS No: 000064-17-5

Name: ETHYL ALCOHOL (ETHANOL)

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CAS No: 000064-19-7  
Name: ACETIC ACID

CAS No: 000064-67-5  
Name: SULFURIC ACID, DIETHYL ESTER

CAS No: 000067-56-1  
Name: METHYL ALCOHOL

CAS No: 000067-63-0  
Name: ISOPROPYL ALCOHOL

CAS No: 000067-64-1  
Name: DIMETHYL KETONE

CAS No: 000067-68-5  
Name: DIMETHYL SULFOXIDE

CAS No: 000068-12-2  
Name: FORMAMIDE, N,N-DIMETHYL

CAS No: 000071-36-3  
Name: BUTANOL

CAS No: 000071-43-2  
Name: BENZENE

CAS No: 000074-89-5  
Name: METHYL AMINE

CAS No: 000075-04-7  
Name: ETHANAMINE

CAS No: 000075-05-8  
Name: ACETONITRILE

CAS No: 000075-09-2  
Name: DICHLOROMETHANE

CAS No: 000075-15-0  
Name: CARBON DISULFIDE

CAS No: 000075-31-0  
Name: 2-PROPANAMINE

CAS No: 000075-35-4  
Name: ETHENE,1,1-DICHLORO

CAS No: 000075-36-5  
Name: ACETYL CHLORIDE

CAS No: 000077-78-1



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Name: SULFURIC ACID, DIMETHYL ESTER

CAS No: 000078-84-2

Name: ISOBUTYRIC ALDEHYDE

CAS No: 000078-87-5

Name: PROPANE, 1,2-DICHLORO

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

CAS No: 000079-20-9

Name: ACETIC ACID, METHYL ESTER

CAS No: 000080-62-6

Name: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER

CAS No: 000096-33-3

Name: 2-PROPENOIC ACID, METHYL ESTER

CAS No: 000100-42-5

Name: STYRENE

CAS No: 000106-93-4

Name: ETHANE, 1,2-DIBROMO

CAS No: 000107-13-1

Name: PROPENENITRILE

CAS No: 000108-10-1

Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-20-3

Name: ISOPROPYL ETHER

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 000108-95-2

Name: PHENOL

CAS No: 000109-60-4

Name: ACETIC ACID PROPYL ESTER

CAS No: 000109-89-7

Name: ETHANAMINE, N-ETHYL

CAS No: 000109-99-9

Name: TETRAHYDROFURAN

CAS No: 000110-82-7

Name: CYCLOHEXANE

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CAS No: 000110-86-1  
Name: PYRIDINE

CAS No: 000121-44-8  
Name: N,N-DIETHYL ETHANAMINE

CAS No: 000121-69-7  
Name: BENZENAMINE, N, N-DIMETHYL

CAS No: 000123-91-1  
Name: 1,4-DIETHYLENE DIOXIDE

CAS No: 000141-78-6  
Name: ETHYL ACETATE

CAS No: 000142-82-5  
Name: N-HEPTANE

CAS No: 000302-01-2  
Name: HYDRAZINE

CAS No: 000544-16-1  
Name: N-BUTYL NITRATE

CAS No: 000563-79-1  
Name: 2,3-DIMETHYL-2-BUTENE

CAS No: 001330-20-7  
Name: XYLENE, M, O & P MIXT.

CAS No: 007446-09-5  
Name: SULFUR DIOXIDE

CAS No: 007647-01-0  
Name: HYDROGEN CHLORIDE

CAS No: 007664-41-7  
Name: AMMONIA

CAS No: 007719-09-7  
Name: THIONYL CHLORIDE

CAS No: 007726-95-6  
Name: BROMINE

CAS No: 007791-25-5  
Name: SULFURYL CHLORIDE

CAS No: 010025-87-3  
Name: PHOSPHORUS OXYCHLORIDE

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CAS No: 0NY075-00-0  
Name: PARTICULATES

CAS No: 0NY100-00-0  
Name: TOTAL HAP

CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0  
Name: VOC

**Condition 1-133: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Replaces Condition(s) 600**

**Item 1-133.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that

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such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 601: Visible Emissions Limited**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 601.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 602: Emissions from new emission sources and/or modifications**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Item 602.1:**

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 603: Less restrictive permissible emission rate possible if BACT applied**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 212.5 (d)**

**Item 603.1:**

Where a source owner can demonstrate to the satisfaction of the commissioner that he will apply best available control technology, the commissioner may specify a less restrictive permissible emission rate, emission standard or degree of air cleaning for such source than required under this Part provided that the less restrictive requirement is equivalent to that which can be achieved through the application of best available control technology

**\*\*\*\* Emission Unit Level \*\*\*\***

**Condition 605: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 228-2.4**

**Item 605.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004

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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 605.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 228-2.4(d), as a "miscellaneous exemption," separate from the "low-usage usage exemption" as defined in 228-2.4(c), a manufacturer or distributor who sells, supplies or offers for sale in the State of New York any commercial or industrial adhesive, sealant, adhesive primer or sealant primer shall not be required to comply with the VOC content limits specified in table 1 of this section, provided that such manufacturer or distributor makes and keeps records demonstrating:

- (1) the commercial or industrial adhesive, sealant, adhesive primer or sealant primer is intended for shipment and use outside of the State of New York; and
- (2) the manufacturer or distributor has taken reasonable precautions to assure that the adhesive, sealant, adhesive primer or sealant primer is not distributed to or within the State of New York.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 606: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 228-2.3 (e)**

**Item 606.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004  
Process: AD1

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 606.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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The VOC content limits in Table 1 of section 228-2.3 for adhesives applied to particular substrates shall apply as follows:

- (1) 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
- (2) 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 607: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 228-2.3 (f) (1)**

**Item 607.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004

Process: AD1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 607.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Except as provided in 228-2.3(f)(2), any person using a surface preparation solvent shall limit the VOC content to less than 70 grams per liter.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

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**Condition 608: Compliance Demonstration**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable State Requirement:6 NYCRR 228-2.3 (f) (3)**

**Item 608.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004

Process: AD1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 608.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Except as provided in 228-2.3(f)(4), any person using a  
cleanup solvent shall limit the composite vapor pressure  
to less than 45 mm Hg at 20 degrees Celsius.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 45 millimeters of mercury

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 609: Compliance Demonstration**  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable State Requirement:6 NYCRR 228-2.3 (f) (4)**

**Item 609.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004

Process: AD1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 609.2:**

Compliance Demonstration shall include the following monitoring:

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Facility DEC ID: 8261400205



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person using a cleanup solvent shall perform the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment as follows:

(i) in an enclosed cleaning system, or equivalent cleaning system as determined by the test method identified in section 228-2.6(h);

(ii) using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material; and

(iii) parts containing dried adhesive may be soaked in a solvent if the composite vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 mm Hg at 20° C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 610: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 228-2.3 (h)**

**Item 610.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004

Process: AD1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 610.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

VOC control approaches shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed 3 tons in a 12 month rolling period, before consideration of controls. These controls





shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

(2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:

(i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;

(ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and

(iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes;

(3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:

(i) store all VOC-containing cleaning materials and used shop towels in closed containers;

(ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing cleaning materials;

(iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

(v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 60 days after the reporting period.  
The initial report is due 3/1/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 611:** No person shall solicit, require the use or specify the application of noncomplaint products.  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable State Requirement:6 NYCRR 228-2.3 (i)**

**Item 611.1:**

This Condition applies to Emission Unit: F-AC004  
Process: AD1

**Item 611.2:**

No person shall solicit, require the use or specify the application of any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent if such use or application results in a violation of Subpart 228-2. The prohibition shall apply to all written or oral contracts under which any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent is to be used at any location in the State of New York.

**Condition 612:** Compliance Demonstration  
Effective between the dates of 01/01/2012 and 12/31/2016

**Applicable State Requirement:6 NYCRR 228-2.5 (a)**

**Item 612.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004  
Process: AD1

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 612.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an emissions unit where a product subject to a VOC content limit in Table 1 of section 228-2.3 is used, shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

1) a list of each commercial and industrial adhesive,

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sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the emissions unit;

(2) identification of each product by product name and description;

(3) the VOC content of each product as supplied;

(4) the mix ratio of any catalysts, reducers or other components used;

(5) the final VOC content or vapor pressure, as applied; and

(6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the emissions unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 613: Container Labeling**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 228-2.7 (b)**

**Item 613.1:**

This Condition applies to Emission Unit: F-AC004  
Process: AD1

**Item 613.2:**

The VOC content of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer shall be calculated using the manufacturer's formulation data or determined using the calculations, procedures and test methods in section 228-2.6.

**Condition 614: Compliance Demonstration**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 228-2.4**

**Item 614.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004

Process: AD2

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Regulated Contaminant(s):  
CAS No: 0NY998-00-0    VOC

**Item 614.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 228-2.4(c), the VOC content limits of section 228-2.3 shall not apply to the use of the identified categories of compounds at the following stationary sources:

(1) Where the total VOC emissions from all adhesives, sealants, adhesive primers and sealant primers used at the emissions unit are less than 200 pounds, or an equivalent volume, per year (12-month rolling average). Emissions from cold cleaning units, vapor degreasers and aerosol products shall not be included in determining the total VOC emissions. Any person claiming this "low-usage exemption" pursuant to this paragraph shall record and maintain monthly operational records sufficient to demonstrate compliance with this exemption and in accordance with section 228-2.5.

(2) Where the total volume of noncompliant commercial or industrial adhesives, sealants, adhesive primers, sealant primers, cleanup solvent and surface preparation solvent used facility-wide does not exceed 55 gallons per year (12- month rolling average). Any person claiming this "low-usage exemption" pursuant to this paragraph shall record and maintain monthly operational records sufficient to demonstrate compliance with this exemption and in accordance with section 228-2.5.

(3) Any facility claiming the "low usage exemption" as described in paragraphs (1) and (2) must have information available, such as purchase orders, material safety data sheets, work orders, or contracts for review by the department, that would allow the department to verify eligibility for the exemption.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 615:    Container Labeling**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 228-2.7 (b)**

**Item 615.1:**

This Condition applies to    Emission Unit: F-AC004

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Process: AD2

**Item 615.2:**

The VOC content of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer shall be calculated using the manufacturer's formulation data or determined using the calculations, procedures and test methods in section 228-2.6.

**Condition 616: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 228-2.5 (d)**

**Item 616.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-AC004  
Process: AD3

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 616.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 228-2.5(d), for adhesives, sealants, adhesive primers and sealant primers subject to the laboratory testing exemption pursuant to section 228-2.4(a)(1) of Subpart 228-2, the person conducting the testing shall make and maintain records of all such materials used, including, but not limited to, the product name, the product category of the material or type of application and the VOC content of each material.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-134: Compliance Demonstration**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Replaces Condition(s) 634**

**Item 1-134.1:**

The Compliance Demonstration activity will be performed for:



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Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205

Emission Unit: U-00021

Emission Point: 11601

Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE

**Item 1-134.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212 Table 2 or Best Available Control Technology (BACT) requirements, emission limits have been established in accordance with Part 212.5(d) for this source. Based on the BACT evaluation, dated February 2014, the emission rate of dichloromethane is limited to 25 pounds per hour and annual emissions of dichloromethane are limited to 170 pounds per year on a rolling twelve-month basis. Emissions shall be calculated on a monthly basis using production records, and incorporated into a twelve-month rolling total, expressed in pounds per year. These records shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated every five years or prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The next re-evaluation shall be submitted no later than March 1, 2019.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-135: Compliance Demonstration**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Replaces Condition(s) 635**

**Item 1-135.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00021

Emission Point: 12007

Regulated Contaminant(s):

CAS No: 000067-56-1 METHYL ALCOHOL  
CAS No: 000067-63-0 ISOPROPYL ALCOHOL  
CAS No: 000067-64-1 DIMETHYL KETONE  
CAS No: 000075-09-2 DICHLOROMETHANE  
CAS No: 000110-82-7 CYCLOHEXANE

**Item 1-135.2:**

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Facility DEC ID: 8261400205



Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212 Table 2 emissions control requirements for acetone (75%), cyclohexane (75%), isopropanol (90%), methanol (94%), and methylene chloride (99%), Kodak shall maintain the fluid flow rates for the scrubbers (Control Devices 12001 and/or 12006) associated with Emission Sources 120BB, 120BC, 120BD, 120BE, 120BF, 120BG, 120BH, 120BJ, 120BK, 120BL, 120BT, 120BU and 120BW as given below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 1,500 kg/hr;
- b) the controller setpoint for specific gravity of recirculated methanol as a scrubbing solution shall be maintained at or below 0.82;
- c) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 30 kg/hr; and
- d) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 300 kg/hr.

The flow rates shall be continuously monitored and the daily averages shall be recorded while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: MASS FLOW RATE

Lower Permit Limit: 1,500 kilograms per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-136: Compliance Demonstration**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Replaces Condition(s) 636**

**Item 1-136.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00021

Emission Point: 120A5

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Regulated Contaminant(s):

CAS No: 000141-78-6 ETHYL ACETATE  
CAS No: 000075-09-2 DICHLOROMETHANE

**Item 1-136.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4 (Table 2) or BACT requirements for Emission Sources 120BM, 120BN, 120BP, 120BV and 120BY, as determined in the most recent BACT evaluation dated March 2012, the sum of the emissions of ethyl acetate and dichloromethane shall not exceed 1.06 tpy on a rolling twelve month basis. In addition the emissions of dichloromethane for the same period shall not exceed 0.13 tpy. Emissions subject to this BACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment and vapor pressure data.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The next re-evaluation shall be submitted no later than March 1, 2017.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-137: Compliance Demonstration**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Replaces Condition(s) 637**

**Item 1-137.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00021 Emission Point: 14201

Regulated Contaminant(s):

CAS No: 000067-64-1 DIMETHYL KETONE  
CAS No: 000075-09-2 DICHLOROMETHANE  
CAS No: 000078-87-5 PROPANE, 1,2-DICHLORO



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CAS No: 000110-82-7      CYCLOHEXANE  
CAS No: 000067-56-1      METHYL ALCOHOL

**Item 1-137.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212 Table 2 control requirements for emissions of methanol (91%), acetone (75%), methylene chloride (99%), dichloropropane (90%), and cyclohexane (70%), Kodak shall maintain the fluid flow rates for the scrubbers (Control Devices 14201 and/or 14202) which control emissions from Emission Sources 115BA, 116BB, 142BA, 142BB, 142BC, 142BD, 142BE, 142BF, 142BG, 142BH, 142BJ, 142BK and 142BL, as given below:

- a) the flow rate of recirculated methanol as scrubbing solution shall be maintained at or above 3,300 kg/hr;
- b) the controller setpoint for specific gravity of recirculated methanol as a scrubbing solution shall be maintained at or below 0.82;
- c) the flow rate of fresh methanol as scrubbing solution shall be maintained at or above 30 kg/hr; and
- d) the flow rate of water as scrubbing media to remove methanol shall be maintained at or above 175 kg/hr.

The flow rates shall be continuously monitored and the daily averages shall be recorded while the process is in operation. Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: MASS FLOW RATE

Lower Permit Limit: 3300 kilograms per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-138: Compliance Demonstration**

**New York State Department of Environmental Conservation**

Permit ID: 8-2614-00205/01801

Facility DEC ID: 8261400205



**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Replaces Condition(s) 641**

**Item 1-138.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00047

Emission Point: 03816

Process: P65

Emission Source: 038AG

Regulated Contaminant(s):

CAS No: 000067-56-1

METHYL ALCOHOL

**Item 1-138.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212 Table 2 or Best Available Control Technology (BACT) requirements for the belt chillers, as determined in the BACT evaluation dated March 2012, the total Methanol emissions shall not exceed 1.5 tpy on a rolling twelve month basis. Additionally, the peak hourly emission rate is limited to 17.3 pounds per hour. Emissions of methanol shall be calculated monthly and incorporated into a 12-month rolling total.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be reevaluated every five years, or prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The next reevaluation shall be submitted no later than March 1, 2017.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-139: Compliance Demonstration**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Replaces Condition(s) 644**

**Item 1-139.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00053

Emission Point: 325X3

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Regulated Contaminant(s):

CAS No: 000062-53-3	ANILINE
CAS No: 000064-19-7	ACETIC ACID
CAS No: 000067-56-1	METHYL ALCOHOL
CAS No: 000067-63-0	ISOPROPYL ALCOHOL
CAS No: 000067-64-1	DIMETHYL KETONE
CAS No: 000074-89-5	METHYL AMINE
CAS No: 000075-05-8	ACETONITRILE
CAS No: 000075-09-2	DICHLOROMETHANE
CAS No: 000075-15-0	CARBON DISULFIDE
CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER
CAS No: 000100-42-5	STYRENE
CAS No: 000107-13-1	PROPENENITRILE
CAS No: 000108-20-3	ISOPROPYL ETHER
CAS No: 000108-88-3	TOLUENE
CAS No: 000109-60-4	ACETIC ACID PROPYL ESTER
CAS No: 000109-99-9	TETRAHYDROFURAN
CAS No: 000110-82-7	CYCLOHEXANE
CAS No: 000121-44-8	N,N-DIETHYL ETHANAMINE
CAS No: 000141-78-6	ETHYL ACETATE
CAS No: 000142-82-5	N-HEPTANE
CAS No: 000302-01-2	HYDRAZINE
CAS No: 007726-95-6	BROMINE
CAS No: 000064-17-5	ETHYL ALCOHOL (ETHANOL)

**Item 1-139.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4 (Table 2) or BACT requirements for the batch organic chemical manufacturing operations, as determined in the BACT evaluation dated September 2013, the sum of the emissions of all of the compounds listed above from Emission Point 325X3 shall not exceed 144 tpy on a rolling twelve month basis.

In addition the sum of emissions of A-rated chemicals as determined by the Department including, but not limited to: aniline, dichloromethane, and hydrazine shall not exceed 2 tpy on a rolling twelve month basis from this emission point.

Monthly records of emissions shall be maintained within the operating area, and shall be made available for review by the Department on request. The records shall consist of raw material usage data, engineering calculations and a



log showing the twelve month rolling emission total. Each month a new rolling total shall be calculated by multiplying the most recent twelve month rolling total by an average fraction emission factor. The average fraction emission factor shall be determined from mass balances performed on typical processes, periodic emission monitoring and other available relevant data.

At least once in every 24 month period from June 1, 2001, emission monitoring shall be performed on a representative point to verify the validity of the calculations used to demonstrate compliance with this condition. The emission monitoring shall be designed to measure, with known accuracy, the emissions of the compounds listed in this condition from at least one of the scrubber fan exhausts which constitute this aggregated source (Emission point 325X3) for a period of at least three days. The measured emissions will be compared to calculated emissions using the most recent emission factors.

If the total emissions of the compounds listed in this condition calculated from the most recent emission factors is less than or equal to 144 or 2 tpy as specified above, then the emission calculations used to demonstrate compliance with this limit will be verified. If the monitored values exceed the calculated values, then the calculation methods and assumptions shall be adjusted accordingly, to more accurately reflect actual emissions.

Records of calculations of emissions of the compounds listed in this condition, the supporting mass balances, raw material usage records and emission monitoring records shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The next reevaluation shall be submitted no later than September 30, 2018.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 643: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Item 643.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: U-00053

Emission Point: 325X3

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 643.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6NYCRR Part 212 Table 2 control requirements for emissions of Hydrochloric Acid, Kodak shall:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) Monitor on a weekly basis the pH of the scrubbing solution used at Control ID's 32502, 32503, 32510, 32511, 32512, 32513, 32514, 32515, and 32516. The pH of the scrubbing solution shall be maintained at or above pH 7. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.
- 3) Operating and maintenance records as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years, and made available to the Department upon request.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 7 pH (STANDARD) units

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-140: Compliance Demonstration**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Replaces Condition(s) 645**

**Item 1-140.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: U-00056

Emission Point: 304A8

Regulated Contaminant(s):

CAS No: 000067-64-1	DIMETHYL KETONE
CAS No: 000074-89-5	METHYL AMINE
CAS No: 000075-04-7	ETHANAMINE
CAS No: 000075-31-0	2-PROPANAMINE
CAS No: 000075-36-5	ACETYL CHLORIDE
CAS No: 000078-84-2	ISOBUTYRIC ALDEHYDE
CAS No: 000096-33-3	2-PROPENOIC ACID, METHYL ESTER
CAS No: 000108-20-3	ISOPROPYL ETHER
CAS No: 000109-60-4	ACETIC ACID PROPYL ESTER
CAS No: 000109-89-7	ETHANAMINE, N-ETHYL
CAS No: 000109-99-9	TETRAHYDROFURAN
CAS No: 007664-41-7	AMMONIA
CAS No: 000067-56-1	METHYL ALCOHOL

**Item 1-140.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4 (Table 2) or BACT requirements for the product solidification operations, as determined in the BACT evaluation dated March, 2012, the sum of the emissions of all contaminants listed above from Emission Point 304A8 shall not exceed 13.15 tpy on a rolling twelve month basis.

Emissions shall be determined by maintaining records of the quantity of each chemical manufactured (synthesized by chemical reaction), by identification number. The records shall be updated monthly and compiled into a twelve month rolling total. Records shall be kept on site and made available to the Department upon request. The methods of calculation shall be those described in Mass Balance Calculation Techniques for the Synthetic Chemicals Division (Copyright (c) by Eastman Kodak Company, 1991.

These records shall be retained on site for five years and made



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available to the Department upon request. The BACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The first reevaluation shall be submitted no later than March 1, 2017.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-141: Compliance Demonstration
Effective between the dates of 01/01/2015 and 12/31/2016

Applicable State Requirement:6 NYCRR 212.4 (a)

Replaces Condition(s) 646

Item 1-141.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060

Regulated Contaminant(s):

- CAS No: 000062-53-3 ANILINE
CAS No: 000064-17-5 ETHYL ALCOHOL (ETHANOL)
CAS No: 000067-56-1 METHYL ALCOHOL
CAS No: 000067-63-0 ISOPROPYL ALCOHOL
CAS No: 000067-64-1 DIMETHYL KETONE
CAS No: 000067-68-5 DIMETHYL SULFOXIDE
CAS No: 000068-12-2 FORMAMIDE, N,N-DIMETHYL
CAS No: 000071-36-3 BUTANOL
CAS No: 000071-43-2 BENZENE
CAS No: 000074-89-5 METHYL AMINE
CAS No: 000075-04-7 ETHANAMINE
CAS No: 000075-05-8 ACETONITRILE
CAS No: 000075-09-2 DICHLOROMETHANE
CAS No: 000075-31-0 2-PROPANAMINE
CAS No: 000075-35-4 ETHENE,1,1-DICHLORO
CAS No: 000075-36-5 ACETYL CHLORIDE
CAS No: 000077-78-1 SULFURIC ACID, DIMETHYL ESTER
CAS No: 000078-84-2 ISOBUTYRIC ALDEHYDE
CAS No: 000078-93-3 METHYL ETHYL KETONE
CAS No: 000080-62-6 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER
CAS No: 000096-33-3 2-PROPENOIC ACID, METHYL ESTER
CAS No: 000106-93-4 ETHANE, 1,2-DIBROMO
CAS No: 000107-13-1 PROPENENITRILE
CAS No: 000108-10-1 2-PENTANONE, 4-METHYL
CAS No: 000108-20-3 ISOPROPYL ETHER

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CAS No: 000108-88-3	TOLUENE
CAS No: 000108-95-2	PHENOL
CAS No: 000109-60-4	ACETIC ACID PROPYL ESTER
CAS No: 000109-89-7	ETHANAMINE, N-ETHYL
CAS No: 000109-99-9	TETRAHYDROFURAN
CAS No: 000110-82-7	CYCLOHEXANE
CAS No: 000110-86-1	PYRIDINE
CAS No: 000121-44-8	N,N-DIETHYL ETHANAMINE
CAS No: 000121-69-7	BENZENAMINE, N, N-DIMETHYL
CAS No: 000123-91-1	1,4-DIETHYLENE DIOXIDE
CAS No: 000141-78-6	ETHYL ACETATE
CAS No: 000142-82-5	N-HEPTANE
CAS No: 000302-01-2	HYDRAZINE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 007647-01-0	HYDROGEN CHLORIDE
CAS No: 007664-41-7	AMMONIA
CAS No: 007719-09-7	THIONYL CHLORIDE
CAS No: 007726-95-6	BROMINE
CAS No: 007791-25-5	SULFURYL CHLORIDE
CAS No: 010025-87-3	PHOSPHORUS OXYCHLORIDE
CAS No: 000563-79-1	2,3-DIMETHYL-2-BUTENE
CAS No: 000544-16-1	N-BUTYL NITRATE
CAS No: 000064-67-5	SULFURIC ACID, DIETHYL ESTER

**Item 1-141.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4 (Table 2) or BACT requirements for the batch synthetic organic chemical manufacturing operations, as determined in the BACT evaluation dated March 2012, the sum of the emissions of all contaminants listed above from Emission Points 30105, 303A8, 303B1, 303X1, 303X2, 303X3, 30403, 304A0, 304B0, 304X1, 304X2, and 337A2 shall not exceed 220 tpy on a rolling twelve month basis. Emissions of Phosphorus Oxychloride, Thionyl Chloride and Sulfuryl Chloride will only be included for Emission Points without control (303X2, 303X3, 337A2).

In addition the sum of emissions of A-rated chemicals as determined by the Department including, but not limited to acrylonitrile, aniline, benzene, dichloromethane, 1,2-dibromoethane, diethyl sulfate, dimethyl sulfate, and hydrazine from Emission Points 30105, 303A8, 303B1, 303X1, 303X2, 303X3, 30403, 304A0, 304B0, 304X1, 304X2, and 337A2, and phosphorus oxychloride from Emission Points 303X2, 303X3 and 337A2 shall not exceed 5.0 tpy on a rolling twelve month basis.

Emissions from large scale chemical manufacturing in B-303





and B-304 shall be determined by maintaining records of the quantity of each chemical manufactured (synthesized by chemical reaction), by identification number. The records shall be updated monthly and compiled into a twelve month rolling total. Records shall be kept on site and made available to the Department upon request. The methods of calculation shall be those described in Mass Balance Calculation Techniques for the Synthetic Chemicals Division (Copyright (c) by Eastman Kodak Company, 1991 or equivalent methods.

At a minimum, 90% of the total chemical production during any 12-month rolling period shall be identified, and engineering calculations performed for them. The monthly total BACT compound emissions for at least 90% of the total chemical production shall be calculated by multiplying the number of batches of each chemical made in that month by the calculated BACT compound emissions per batch. The BACT compound emissions shall be calculated by extrapolating the results on at least 90% of the total chemical production by the following formula:

Total BACT compound emissions = BACT compound emissions (90)/P

Where:

Total BACT compound emissions = total BACT compound emissions from all manufacturing operations  
BACT compound emissions (90) = BACT compound emissions from at least 90% of the total chemicals manufactured, and

P = weight proportion of the chemicals with calculated emissions (at least 90%) to all chemicals manufactured

For small scale chemical manufacturing operations in B-337, monthly records of emissions shall be maintained within the operating area, and shall be made available for review by the Department on request. The records shall consist of raw material usage data, engineering calculations based on established emission factors, and a log showing the twelve month rolling total of each applicable contaminant. Each month the rolling total emissions from the small scale operations shall be added to the rolling total calculated from the large scale operations to compute the total emissions of each applicable contaminant for Emission Unit U-00060.

Emissions from solvent cleaning operations will be based on 1) raw material usage records maintained for each portable cart wash fill station, and 2) an emission factor of 15% of the quantity of BACT compound filled in the wash



carts, unless otherwise determined by subsequent mass balance studies.

In order to verify the validity of the engineering calculations used to demonstrate continuous compliance with the 220 ton per year emission limitation, Kodak shall do the following:

(a) At least once in every 24 month period after June 1, 2001, emission monitoring shall be performed on a representative source. The emission monitoring shall be designed to measure, with known accuracy, the total BACT compound emissions from at least one complete reactor system for a period of at least three days. Engineering calculations shall also be performed on the same representative source reactor system, and the calculated emissions compared to the monitored emissions. If the monitored emissions are less than the calculated emissions, then the engineering calculations shall be confirmed as valid. If the monitored values exceed the calculated values, then the calculation methods shall be adjusted accordingly, to more accurately reflect actual emissions.

(b) All vapor-tight centrifuges designed for BACT compound usage shall be checked monthly to ensure that the average leak rate is less than or equal to 1 cubic foot per minute (cfm).

(c) All Pipe-in-trench systems shall be checked monthly to ensure that the average leak rate is less than or equal to 50 standard cubic feet per hour (scfh).

(d) A minimum of 12 reactors shall be checked quarterly to ensure that the average leak rate is less than or equal to 2 pounds per hour (lb/hr) at 20 inches Hg vacuum. All reactors will be checked at least once per year.

(e) A minimum of 12 reactor inertion systems shall be checked quarterly to ensure that average fast-nitrogen purge rates will be maintained between 160 and 240 scfh and average slow-nitrogen purge rates will be maintained between 9 and 13 scfh. All reactor inertion systems will be checked at least once per year.

(f) A minimum of 6 rotary dryers will be checked quarterly to ensure that the average leak rate is less than or equal to 8 lb/hr at 20 inches Hg vacuum. All rotary dryers will be checked at least once per year.

These records shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated every five years, or

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prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The next re-evaluation shall be submitted by March 1, 2017.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 647: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Item 647.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060

Emission Point: 303A8

Regulated Contaminant(s):

CAS No: 000064-19-7	ACETIC ACID
CAS No: 007719-09-7	THIONYL CHLORIDE
CAS No: 007791-25-5	SULFURYL CHLORIDE
CAS No: 010025-87-3	PHOSPHORUS OXYCHLORIDE
CAS No: 007647-01-0	HYDROGEN CHLORIDE

**Item 647.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6NYCRR Part 212 Table 2 control requirements for emissions of Acetic Acid, Hydrochloric Acid, Thionyl Chloride, Phosphorus Oxychloride and Sulfuryl Chloride, Kodak shall operate and maintain the scrubber (Control Device 30304) as follows:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubber. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, the scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.
- 3) Operating and maintenance records, as well as a weekly log showing the date, initials of the operator, results

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of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 7 pH (STANDARD) units  
Monitoring Frequency: WEEKLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 648: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Item 648.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060                      Emission Point: 303B1

Regulated Contaminant(s):

CAS No: 000064-19-7	ACETIC ACID
CAS No: 007719-09-7	THIONYL CHLORIDE
CAS No: 007791-25-5	SULFURYL CHLORIDE
CAS No: 010025-87-3	PHOSPHORUS OXYCHLORIDE
CAS No: 007647-01-0	HYDROGEN CHLORIDE

**Item 648.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212 Table 2 control requirements for emissions of Acetic Acid, Hydrochloric Acid, Thionyl Chloride, Phosphorus Oxychloride and Sulfuryl Chloride, Kodak shall operate and maintain scrubbers (Control Device 30312) as follows:

1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.

2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating

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properly.

3) Operating and maintenance records, as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: ACIDITY/ALKALINITY
Lower Permit Limit: 7 pH (STANDARD) units
Monitoring Frequency: WEEKLY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 649: Compliance Demonstration
Effective between the dates of 01/01/2012 and 12/31/2016

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 649.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060 Emission Point: 303X1

Regulated Contaminant(s):

CAS No: 000064-19-7 ACETIC ACID
CAS No: 007719-09-7 THIONYL CHLORIDE
CAS No: 007791-25-5 SULFURYL CHLORIDE
CAS No: 010025-87-3 PHOSPHORUS OXYCHLORIDE
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 649.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6NYCRR Part 212 Table 2 control requirements for emissions of Acetic Acid, Hydrochloric Acid, Sulfuryl Chloride, Phosphorus Oxychloride and Thionyl Chloride, Kodak shall operate and maintain scrubbers (Control Devices 30309, 30310, and 30311) as follows:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
2) On a weekly basis, the pH of the scrubbing solution

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shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.

3) Operating and maintenance records, as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 7 pH (STANDARD) units  
Monitoring Frequency: WEEKLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 650: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Item 650.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060                      Emission Point: 304B0

Regulated Contaminant(s):  
CAS No: 000064-19-7                      ACETIC ACID  
CAS No: 007446-09-5                      SULFUR DIOXIDE  
CAS No: 007719-09-7                      THIONYL CHLORIDE  
CAS No: 007647-01-0                      HYDROGEN CHLORIDE

**Item 650.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6NYCRR Part 212 Table 2 control requirements for emissions of Acetic Acid, Sulfur Dioxide, Thionyl Chloride and Hydrochloric Acid, Kodak shall operate and maintain the scrubber (Control Device 30410) as follows:

1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubber. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.

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2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, the scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.

3) Operating and maintenance records, as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 7 pH (STANDARD) units

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 651: Compliance Demonstration**

**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Item 651.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060

Emission Point: 304B0

Process: I45

Regulated Contaminant(s):

CAS No: 000067-56-1

METHYL ALCOHOL

**Item 651.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4 (Table 2) or BACT requirements, the coolant outlet temperature of the vacuum pump condenser (Control ID 30417) shall be maintained at a maximum of 0 degrees centigrade while the auto filter dryer system is in use to process methanol. Records must be kept on site and made available to the Department upon request.

Parameter Monitored: TEMPERATURE

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Upper Permit Limit: 0 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 652: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Item 652.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060

Emission Point: 304X1

Regulated Contaminant(s):

CAS No: 000064-19-7	ACETIC ACID
CAS No: 007719-09-7	THIONYL CHLORIDE
CAS No: 007791-25-5	SULFURYL CHLORIDE
CAS No: 010025-87-3	PHOSPHORUS OXYCHLORIDE
CAS No: 007647-01-0	HYDROGEN CHLORIDE

**Item 652.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6NYCRR Part 212 Table 2 control requirements for emissions of Acetic Acid, Hydrochloric Acid, Sulfuryl Chloride, Phosphorus Oxychloride and Thionyl Chloride, Kodak shall operate and maintain the scrubber (Control Device 30416) as follows:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubber. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) On a weekly basis, the pH of the scrubbing solution shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, the scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.
- 3) Operating and maintenance records, as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the



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Department upon request.

Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 7 pH (STANDARD) units  
Monitoring Frequency: WEEKLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 653: Compliance Demonstration**  
**Effective between the dates of 01/01/2012 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Item 653.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00060                      Emission Point: 304X2

Regulated Contaminant(s):

CAS No: 000064-19-7	ACETIC ACID
CAS No: 007719-09-7	THIONYL CHLORIDE
CAS No: 007791-25-5	SULFURYL CHLORIDE
CAS No: 010025-87-3	PHOSPHORUS OXYCHLORIDE
CAS No: 007647-01-0	HYDROGEN CHLORIDE

**Item 653.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6NYCRR Part 212 Table 2 control requirements for emissions of Acetic Acid, Hydrochloric Acid, Sulfuryl Chloride, Phosphorus Oxychloride and Thionyl Chloride, Kodak shall operate and maintain the scrubbers (Control Device 30412 and 30413) as follows:

- 1) On a weekly basis, Kodak shall visually verify that the scrubbing solution is flowing through the scrubbers. If the solution is not flowing, corrective action shall be taken and Kodak shall note it in the record.
- 2) On a weekly basis, the pH of the scrubbing solution used at Control Device 30412 and 30413 shall be monitored and maintained at or above 7 pH units. Additionally, at least once per year, each scrubber shall be inspected and standard preventative maintenance shall be performed to ensure the scrubber is operating properly.



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3) Operating and maintenance records, as well as a weekly log showing the date, initials of the operator, results of visual observation for flow and pH reading shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 7 pH (STANDARD) units  
Monitoring Frequency: WEEKLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-142: Compliance Demonstration**  
**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Replaces Condition(s) 655**

**Item 1-142.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00084

Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE

**Item 1-142.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4(a) BACT requirements, emissions of Dichloromethane from EP 308B5 and EP 308B7 shall not exceed 5.0 tons per year on a rolling 12-month basis, based on the most recent BACT Evaluation, dated March 2014. Monthly emissions of dichloromethane (DCM) shall be determined as follows:

Monthly Emissions of DCM = A + B + C + D - E - F  
where,

A = Total quantity of Dichloromethane contained in coating solutions which were prepared outside the DPC Facility and brought into the DPC Facility during the month

B = Total quantity of Dichloromethane used by the DPC Facility to prepare coating solutions within the DPC Facility during the month

C = Total quantity of Dichloromethane contained in the inventory of cleaning solutions used by the DPC Facility

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at the beginning of the month

D = Total quantity of Dichloromethane added to the inventory of cleaning solutions used by the DPC Facility during the month

E = Total quantity of Dichloromethane contained in coating solutions which were returned to the customer or discarded as liquid waste by the DPC Facility during the month

F = Total quantity of Dichloromethane contained in the inventory of cleaning solutions used by the DPC Facility at the end of the month

Note: This calculation methodology is conservative in that it includes emissions from other sources.

Records shall be retained on site for five years and made available to the Department's representative upon request.

The BACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The next such re-evaluation report shall be submitted no later than March 31, 2019.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-143: Compliance Demonstration**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

**Replaces Condition(s) 656**

**Item 1-143.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00084

Emission Point: 308B5

Regulated Contaminant(s):

CAS No: 000079-20-9

ACETIC ACID, METHYL ESTER

CAS No: 000067-64-1

DIMETHYL KETONE

**Item 1-143.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4(a) BACT requirements, emissions of Dimethyl Ketone (Acetone) and Methyl Acetate from EP 308B5 shall not

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exceed 25 tons per year on a rolling 12-month basis, based on the most recent BACT Evaluation, dated March 2014. Monthly emissions of acetone and methyl acetate shall be determined as follows:

$$\text{Monthly Emissions of Acetone \& Methyl Acetate} = A + B + C + D - E - F$$

where,

A = Total quantity of Acetone & Methyl Acetate contained in coating solutions which were prepared outside the DPC Facility and brought into the DPC Facility during the month

B = Total quantity of Acetone & Methyl Acetate used by the DPC Facility to prepare coating solutions within the DPC Facility during the month

C = Total quantity of Acetone & Methyl Acetate contained in the inventory of cleaning solutions used by the DPC Facility at the beginning of the month

D = Total quantity of Acetone & Methyl Acetate added to the inventory of cleaning solutions used by the DPC Facility during the month

E = Total quantity of Acetone & Methyl Acetate contained in coating solutions which were returned to the customer or discarded as liquid waste by the DPC Facility during the month

F = Total quantity of Acetone & Methyl Acetate contained in the inventory of cleaning solutions used by the DPC Facility at the end of the month

Note: This calculation methodology is conservative in that it includes emissions from other sources.

Records shall be retained on site for five years and made available to the Department's representative upon request.

The BACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved or pending BACT evaluation. The next such re-evaluation report shall be submitted no later than March 31, 2019.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-144: Compliance Demonstration**

**Effective between the dates of 01/01/2015 and 12/31/2016**

**Applicable State Requirement: 6 NYCRR 212.4 (a)**

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**Item 1-144.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00090

Emission Point: 326C7

Regulated Contaminant(s):

CAS No: 000067-56-1

METHYL ALCOHOL

**Item 1-144.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with the 6 NYCRR Part 212 Table 2 requirement for 90% control of Methanol, Kodak shall maintain the water flow rate to each of the two scrubbers (Control Device 32622) at or above 15 gal/min on an average hourly basis with up to 4 plating lines operating. The scrubber flow rates shall be recorded a minimum of once per minute while the process is in operation. The flow monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and established operations procedures. Records shall be kept on site for 5 years and made available to the Department upon request.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 15 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1  
MINUTE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

