TECHNICAL REVIEW DOCUMENT
FOR
OPERATING PERMIT 06OPWE288

to be issued to:

Kodak Colorado Division - Eastman Kodak Co.
Health Group
Weld County
Source ID 1230003

Prepared by Cathy Rhodes
September, 2006

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the Operating Permit proposed for this site. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the application submitted September 18, 2006. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description

This source is classified as a manufacturer of photographic supplies under the Standard Industrial Classification code 3861. The facility uses such processes as plastic extrusion and coating to produce light-sensitive films and papers for use in photography. Two natural gas fired 206 mmBtu/hour steam generators provide building and process heat throughout the facility. Two other boilers are used as back-up sources only.

The facility is located near Windsor, an attainment area for all pollutants. The facility is located in the 8-Hour Ozone Control Area. As defined in Regulation No. 7, II.A.16, "8-Hour Ozone Control Area" means for Weld County, that portion of the county that lies south of a line described as follows: Beginning at a point on Weld County's eastern boundary and Logan County's western boundary intersected by 40 degrees, 42 minutes, 47.1 seconds north latitude, proceed west on 40 degrees, 47.1 seconds north latitude until this line intersects Weld County's western boundary and Larimer County's eastern boundary. This facility is within 100 km of two Class I areas, Rocky Mountain National Park, and Rawah National Wilderness Area. Wyoming is an affected state within 50 miles of the facility.

Operating Permit 96OPWE128 was previously issued for the entire facility. The

permittee has requested two permits for the facility. This permit covers Buildings C40, 41, 42, 43, 46, and 50. Permit 96OOPWE128 continues to cover the remainder of the facility.

Facility emissions (total for both permits) are as follows:

	Pollutant	Actual** (tpy)
NO_x	223	129
CO	200	37
VOC	223	54
PM	24	14
PM_{10}	24	14
HAPs	N/A	22

*Based on permitted emissions.
**Actual emissions are based on the latest APENs on file

II. Discussion of Modifications Made

Conditions relating to Buildings C40, 41, 42, 43, 46 and 50 are removed from permit 96OPWE128 and incorporated into this new permit. The permit contained facility wide emission limits. The emission limits are divided between the two permits, and the total remains as previously permitted.

III. Other Modifications

This modification incorporates a minor permit modification requested on July 19, 2006, as described below. The minor modification request was sent to the EPA for their 45 day review period, but a revised permit was not issued. Instead, the minor modification was to be included with a significant permit modification action that was being processed.

> KCD will again use Dibutyl Phthalate (DBP) in Building C-40, due to a raw material supply restriction on the material that replaced DBP. Therefore, filters over the high-temperature melt kettles will be used again. DBP acts as a particulate under the process parameters used, and the filters minimize PM emissions. PM emissions calculation procedures are added to Condition 1.1 for Building C-40, and the filters are added to the Appendix G equipment list. Monitoring will consist of operating and maintaining the filters in accordance with manufacturer's specifications and good engineering practices.
>
> Through source testing, KCD determined that the extrusion process in Building C-50 generates a small amount of HAPs. The current calculation procedure for Building C-50 assumes that consumption equals emission. Condition 1.1 is revised to add procedures for the emissions that are generated (not consumed) during the process. In addition, this new emission factor will account for VOC emitted from a new clean scrap recycling unit that feeds waste material back into the feedstock stream. These emissions are less than the significant levels, therefore this correction in emission factors qualifies as a minor permit

modification.

The facility permit contact information is updated.

The area attainment description is updated.