

February 2017

**REGULATION 13 CLASS II  
ADMINISTRATIVE UPDATE**

**MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA**

**PREPARED BY:**

**Mylan Pharmaceuticals Inc.**



781 Chestnut Ridge Road  
Morgantown, WV 26505 USA  
Phone 304.599.2595  
Web www.mylan.com

February 24, 2017

NSR Permitting Manager  
WV Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

RE: Mylan Pharmaceuticals Inc., Chestnut Ridge Manufacturing Facility  
DAQ Plant ID# 061-00033  
Application for NSR Permit (R13-2068T) and Title V Permit (R30-06100033-2017 MM01) Modifications

Dear Sir or Madam:

Mylan Pharmaceuticals Inc. (Mylan) hereby submits for your review and subsequent approval, a Rule 13 Class II Administrative Update and Title V Permit Revision regarding changes of operation at Mylan's Chestnut Ridge Road manufacturing facility in Morgantown, WV. The application includes the following updates/modifications to Mylan's Rule 13/Title V permit:

- The addition of a coating pan and associated dust collector to the facility
- The addition of a cartridge type dust collector to control particulate matter emissions from production rooms.

Enclosed is the following information completing said permit application:

- Original "Permit Application"
- One signed hard copy and two CDs of the "Permit Application"
- The check payable to WVDEP Division of Air Quality for the \$300 application fee

The attached Class I Legal Advertisement will be published in the Dominion Post within five (5) days of your office's receipt of this permit application. An "Affidavit of Publication" shall be provided to the Division of Air Quality upon the completion of said publication.

Mylan has always strived to maintain a proactive role in assuring environmental compliance and appreciates your assistance in this permit application. Should you require any additional information, please contact me directly at the address provided by the letterhead or by telephoning (304) 599-2595, extension 4583.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jonathan Lewin', written over a light blue circular stamp.

Jonathan Lewin  
Environmental Engineer, MPI Environmental, Health and Safety

cc: Brian Tephabock, WV DEP  
Mylan Inc., Global EHS

# **TABLE OF CONTENTS**

\$300 Application Fee (Class II Administrative Update)

## **Appendix 1 – Application for Permit to Modify / Construct**

1. Application for NSR Permit
2. Application Attachments
  - A) Business Certificate
  - B) Site Location Map
  - C) Installation and Startup Schedule
  - D) Regulatory Discussion
  - E) Plot Plan
  - F) Process Flow Diagrams
  - G) Process Description
  - H) *Not Required: MSDS Sheets*
  - I) Emissions Unit Table
  - J) Emission Points Data Summary Sheet
  - K) *Not Required: Fugitive Emissions Data Sheet*
  - L) Emissions Unit Data Sheet
  - M) Air Pollution Control Device Sheet
    - Cartridge Type Dust Collector (Coater)
    - Cartridge Type Dust Collector (Production room)
  - N) Supporting Calculations
    - Coating Pan
    - Production Rooms
  - O) *Not Required: Monitoring/Recordkeeping/Reporting/Testing Plans*
  - P) Public Notice
  - Q) *Not Required: Business Confidential Claims*
  - R) *Not Required: Authority Forms*
  - S) Title V Permit Revision Information

## **Appendix 2 – Mylan Proposed Draft Permit Terms**

1. R13 Proposed Terms
2. Title V Proposed Terms

## **Appendix 3 – PSD Review**

1. PSD Review Summary



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**DIVISION OF AIR QUALITY**

601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
(304) 926-0475  
[www.dep.wv.gov/daq](http://www.dep.wv.gov/daq)

**APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION  
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):

- CONSTRUCTION     MODIFICATION     RELOCATION  
 CLASS I ADMINISTRATIVE UPDATE     TEMPORARY  
 CLASS II ADMINISTRATIVE UPDATE     AFTER-THE-FACT

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION  
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

**FOR TITLE V FACILITIES ONLY:** Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

**Section I. General**

1. Name of applicant (as registered with the WV Secretary of State's Office): Mylan Pharmaceuticals Inc.		2. Federal Employer ID No. (FEIN): 5 5 0 4 5 5 4 2 3	
3. Name of facility (if different from above): 4. Chestnut Ridge Facility		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: P.O. Box 4310 Morgantown, WV 26504-4310		5B. Facility's present physical address: 781 Chestnut Ridge Road Morgantown, WV 26505	
6. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If <b>YES</b> , provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b> . – If <b>NO</b> , provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b> .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation: Mylan Inc.			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If <b>YES</b> , please explain:    Applicant owns the site. – If <b>NO</b> , you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.): Pharmaceutical Manufacturing Facility		10. North American Industry Classification System (NAICS) code for the facility: 325412	
11A. DAQ Plant ID No. (for existing facilities only): 0 6 1 – 0 0 0 3 3		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2068S, issued October 21, 2016 R30-06100033-2017, awaiting issuance	

**All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.**

12A.

- For **Modifications, Administrative Updates or Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction or Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP as Attachment B**.

I-79 to exit 155 follow signs for W.V.U. Follow US Route 19 to Coliseum. Turn left onto SR 705 for approximately 1.2 miles. Turn right to stay on SR 705 (Chestnut Ridge Road). Follow for approximately 0.6 miles to plant on left.

12.B. New site address (if applicable): N/A	12C. Nearest city or town: Morgantown	12D. County: Monongalia
--	--	----------------------------

12.E. UTM Northing (KM): 4390.1	12F. UTM Easting (KM): 589.6	12G. UTM Zone: 17
---------------------------------	------------------------------	-------------------

13. Briefly describe the proposed change(s) at the facility:  
Mylan proposes to add a new coating pan unit due to increases in production demand. An associated dust collector will be installed to control particulate emissions. Mylan also proposes to add a new processing room general exhaust dust collection unit due to increases in production airflow demands.

14A. Provide the date of anticipated installation or change: Modification: 04/17/2017 – If this is an <b>After-The-Fact</b> permit application, provide the date upon which the proposed change did happen: / /	14B. Date of anticipated Start-Up if a permit is granted: 05/29/2017
--	---

14C. Provide a **Schedule** of the planned **Installation of/Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:  
Hours Per Day 24 Days Per Week 7 Weeks Per Year 52

16. Is demolition or physical renovation at an existing facility involved?  **YES**  **NO**

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see [www.epa.gov/ceppo](http://www.epa.gov/ceppo)), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*if known*). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (*if known*). Provide this information as **Attachment D**.

***Section II. Additional attachments and supporting documents.***

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to **Plot Plan Guidance**) .  
– Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.  
– Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

***All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.***

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.  
 – For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger	

General Emission Unit, specify: Production room general exhaust

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

<input type="checkbox"/> Absorption Systems	<input checked="" type="checkbox"/> Baghouse (Cartridge collector)	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System

Other Collectors, specify:

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**. This information is included in Attachment M.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES       NO

➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's **"Precautionary Notice – Claims of Confidentiality"** guidance found in the **General Instructions** as **Attachment Q**.

### Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**.

**All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.**

**35A. Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

**Certification of Truth, Accuracy, and Completeness**

I, the undersigned  **Responsible Official** /  **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

**Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE  (Please use blue ink) DATE: 02.29.2017 (Please use blue ink)

35B. Printed name of signee: John Sylvester		35C. Title: Head of OSD Site Operations
35D. E-mail: john.sylvester@mylanlabs.com	36E. Phone: 304-599-2595	36F. FAX: 304-598-5471
36A. Printed name of contact person (if different from above): Jonathan Lewin		36B. Title: Environmental Engineer
36C. E-mail: jonathan.lewin@mylan.com	36D. Phone: 304-554-4583	36E. FAX: 304-598-5471

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate               | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet            |
| <input checked="" type="checkbox"/> Attachment B: Map(s)                             | <input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)          |
| <input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input checked="" type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion              | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations     |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan                          | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)   | <input checked="" type="checkbox"/> Attachment P: Public Notice                         |
| <input checked="" type="checkbox"/> Attachment G: Process Description                | <input type="checkbox"/> Attachment Q: Business Confidential Claims                     |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)            | <input type="checkbox"/> Attachment R: Authority Forms                                  |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table               | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information   |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee                                     |

*Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.*

**FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:**

- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
  - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
  - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
  - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
  - NSR permit writer should notify a Title V permit writer of draft permit,
  - Public notice should reference both 45CSR13 and Title V permits,
  - EPA has 45 day review period of a draft permit.

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment A**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

**WEST VIRGINIA  
STATE TAX DEPARTMENT  
BUSINESS REGISTRATION  
CERTIFICATE**

ISSUED TO:  
**MYLAN PHARMACEUTICALS INC  
DBA MYLAN PHARMACEUTICALS  
781 CHESTNUT RIDGE RD  
MORGANTOWN, WV 26505-2730**

**BUSINESS REGISTRATION ACCOUNT NUMBER: 1034-8407**

This certificate is issued on: 06/24/2010

*This certificate is issued by  
the West Virginia State Tax Commissioner  
in accordance with W.Va. Code § 11-12.*

*The person or organization identified on this certificate is registered  
to conduct business in the State of West Virginia at the location above.*

**This certificate is not transferrable and must be displayed at the location for which issued.**

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

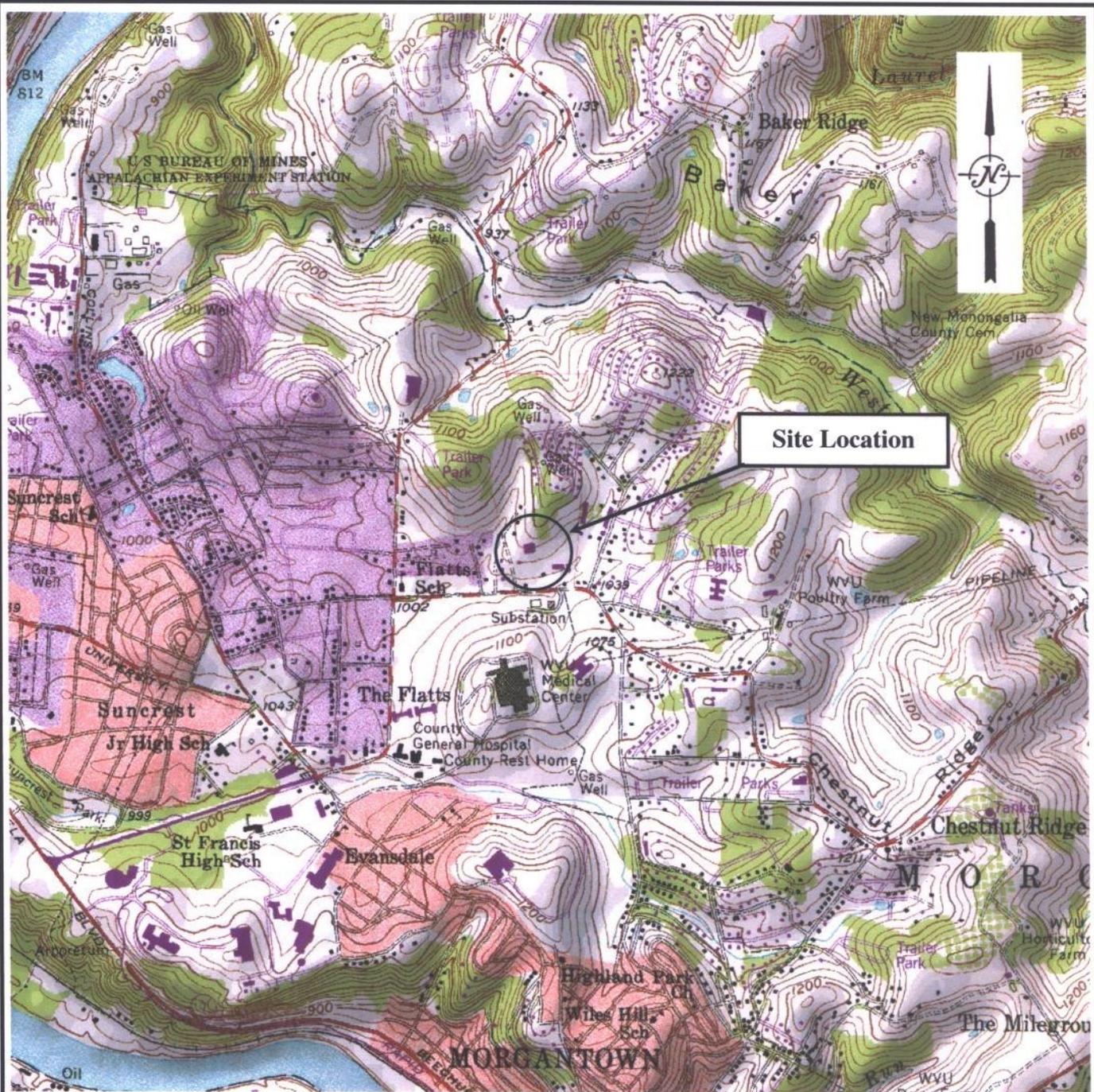
Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

**TRAVELING/STREET VENDORS:** Must carry a copy of this certificate in every vehicle operated by them.  
**CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS:** Must have a copy of this certificate displayed at every job site within West Virginia.

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment B**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA



Reference:  
 3-D TopoQuads © DeLorme,  
 Yarmouth, Me 04096  
 Source Data:  
 7.5 Minute USGS  
 Topographic Quadrangle  
 Morgantown North, WV

**Vicinity Map**

Scale 1" = 2000'

**Mylan  
 Pharmaceuticals**

**Air Permit Application**

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment C**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

**ATTACHMENT C – CURRENT INSTALLATION & START UP SCHEDULE**

<b>Equipment</b>	<b>Proposed Installation Date</b>	<b>Proposed Start Up Date</b>
New Coating Pan and associated dust collector	April 17, 2017	May 29, 2017
New cartridge type dust collector (74 addition exhaust)	April 30, 2017	June 5, 2017

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment D**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

## ATTACHMENT D – REGULATORY DISCUSSION

The following tables discuss the most significant air quality regulatory requirements that Mylan believes apply to the proposed changes.

<b>Presumed Applicable Air Quality Requirements</b>			
<b>Regulatory Citation</b>	<b>Emission Source Affected</b>	<b>Description of Applicability</b>	<b>Compliance Demonstration</b>
45CSR7-3.1	Coating pan	20% max. opacity from all PM-emitting vent points other than the boilers vent points.	Quarterly visual observation and recordkeeping of visual observations.
	74-addition processing rooms		
45CSR7-4.1	Coating pan	PM emission limits from all PM-emitting vent points other than the boilers vent points.	Proper operation and maintenance of cartridge collectors.
	74-addition processing rooms		

The following table discusses the most significant air quality regulatory requirements that Mylan believes do not apply to the affected permit application.

<b>Presumed Non-Applicable Air Quality Requirements</b>		
<b>Regulatory Citation</b>	<b>Emission Sources Presumed to be Non-Applicable</b>	<b>Basis of Non-Applicability</b>
45CSR27	All Sources in the proposed modification.	The proposed modification will not discharge any toxic air pollutant (as defined at 45CSR27-2.10.) into the open air in excess of the amounts shown in Table A of 45CSR27.
40CFR61 – All Subparts	All Sources in the proposed modification.	Mylan does not believe that any 40CFR61 NESHAPS regulations apply to the proposed modification.
40CFR63 – All Subparts	All Sources in the proposed modification.	Mylan does not believe that any 40CFR63 MACT regulations apply to the proposed modification.
45CSR14	All Sources in the proposed modification.	The proposed modification is not a “significant modification” as defined in 45CSR14. A more detailed discussion on this topic is attached in Appendix 3.

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment E**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

Attachment E - Plot Plan

Mylan Pharmaceuticals, Inc.

Chestnut Ridge Road Facility

Plant ID: 031-00066

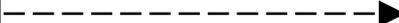
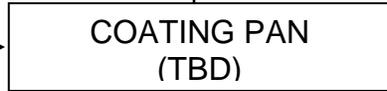
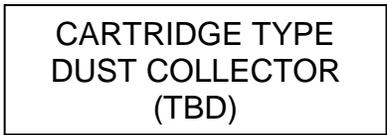
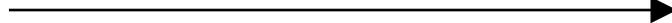


APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment F**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

PHARMACEUTICAL TABLETS AND  
COATINGS



CARTRIDGE  
COLLECTOR STACK  
(247)

**LEGEND**

- Product Flow
- Emission

---

MYLAN PHARMACEUTICALS INC.  
MORGANTOWN, WV

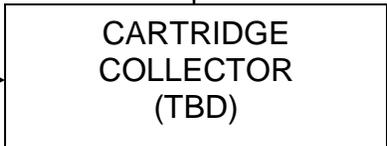
45CSR13 APPLICATION  
ATTACHMENT F

PROCESS FLOW DIAGRAM

CARTRIDGE  
COLLECTOR STACK  
(324)



PARTICULATE MATTER EMISSIONS FROM  
MULTIPLE PRODUCTION ROOMS



CARTRIDGE  
COLLECTOR  
(TBD)

MYLAN PHARMACEUTICALS INC.  
MORGANTOWN, WV

---

45CSR13 APPLICATION  
ATTACHMENT F

CARTRIDGE COLLECTOR FOR  
PRODUCTION ROOM EMISSIONS  
PROCESS FLOW DIAGRAM

**LEGEND**

---

—————▶ Product Flow

- - - - -▶ Emission

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment G**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

## **ATTACHMENT G – PROCESS DESCRIPTION**

### **Chestnut Ridge Road Facility Overview**

Mylan Pharmaceuticals Inc. (Mylan) is a batch pharmaceutical manufacturing company. Mylan purchases raw materials from various suppliers. Once the material is cleared by quality control, it is weighed, blended, granulated, formulated, and packaged. The final products from the Chestnut Ridge facility are solid dose pharmaceuticals. The facility incorporates a quality control laboratory.

All of the processes at the Chestnut Ridge Facility are in accordance with the rules and regulations of the United States Food and Drug Administration (FDA). The FDA (along with Mylan's quality control) limits the release/loss of pharmaceutical ingredients during manufacturing processes. This includes the release/loss of pharmaceutical ingredients to the atmosphere as air emissions of particulate matter.

### **Coating Pan**

Mylan currently operates several, permitted coating pan units at the Chestnut Ridge location. The purpose of this application is to install a new coating pan at the site. This installation is part of a new project and is only related to business demand and an increase in production rates. A cartridge style dust collector will be installed downstream of the coating pan in the same setup that currently exists at the Chestnut Ridge facility.

### **Dust control for processing rooms**

Mylan currently operates a section of production rooms where the general room exhaust is vented to rotoclone units. Mylan has elected to install a single dust collection unit on the roof to provide additional room ventilation and filtration to provide additional airflow and maintain negative pressure inside the processing rooms. As part of this permit application, the new dust collector will be a new air emission control unit. There are no new emission sources associated with the new dust collector proposed in this application.

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment I**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

## ATTACHMENT I – EMISSION UNITS TABLE

(includes all emission units and air pollution control devices that will be part of this permit application review, regardless of permitting status)

Emission Unit ID <sup>1</sup>	Emission Point ID <sup>2</sup>	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type <sup>3</sup> and Date of Change	Control Device <sup>4</sup>
<b>247</b>	<b>247</b>	<b>Coating Pan (TBD)</b>	<b>2017</b>	<b>750 lb/load maximum</b>	<b>New</b>	<b>Cartridge Type Dust Collector (TBD)</b>
<b>Rooms 74-101 – 74-110</b>	<b>324</b>	<b>74-addition Area General Production Room Ventilation</b>	<b>2017</b>	<b>Varies</b>	<b>New</b>	<b>Cartridge Type Dust Collector (TBD)</b>

<sup>1</sup> For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation

<sup>2</sup> For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation

<sup>3</sup> New, modification, removal

<sup>4</sup> For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment J**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

**Attachment J**  
**EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data

Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type <sup>1</sup>	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS <sup>3</sup>  (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions <sup>4</sup>		Maximum Potential Controlled Emissions <sup>5</sup>		Emission Form or Phase  (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used <sup>6</sup>	Emission Concentration <sup>7</sup> (ppmv or mg/m <sup>4</sup> )
		ID No.	Source	ID No.	Device Type	Short Term <sup>2</sup>	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
247	Upward vertical stack	TBD	Coating Pan	TBD	Cartridge Type Dust Collector	N/A	N/A	PM	16.88	41.78	0.84	6.25 is current limit in R13-2068S and Title V for Emission Units 215, 241, 242, 244, 245 and 246 (247 to be included)	Solid; Particulate	MB	N/A
324	N/A	N/A	Room General Ventilation Emissions (Rooms 74-101-110)	TBD	Cartridge Type Dust Collector	C	8736	PM	9.19	28.94	0.18	0.58	Solid; PM	MB	N/A

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

<sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

<sup>2</sup> Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

<sup>3</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. **DO NOT LIST** H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.

<sup>4</sup> Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>5</sup> Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>6</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

<sup>7</sup> Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m<sup>3</sup>) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO<sub>2</sub>, use units of ppmv (See 45CSR10).

**Attachment J**  
**EMISSION POINTS DATA SUMMARY SHEET**

Table 2: Release Parameter Data								
Emission Point ID No. <i>(Must match Emission Units Table)</i>	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow <sup>1</sup> (acfm) <i>at operating conditions</i>	Velocity (fps)	Ground Level <i>(Height above mean sea level)</i>	Stack Height <sup>2</sup> <i>(Release height of emissions above ground level)</i>	Northing	Easting
247	N/A	113 - 176	4000	N/A	~1000	~60	Approx: Zone 17; 4390.5540971422 205 (Lat 39.660129)	Approx: Zone 17; 589.3285978 954759 (Long - 79.958659)
324	N/A	70	30,000	N/A	~500	~30	Approx: Zone 17; 4390.5540971422 205 (Lat 39.660129)	Approx: Zone 17; 589.3285978 954759 (Long - 79.958659)

<sup>1</sup> Give at operating conditions. Include inerts.

<sup>2</sup> Release height of emissions above ground level.

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment L**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

**Attachment L**  
**EMISSIONS UNIT DATA SHEET**  
**GENERAL**

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*): 247

1. Name or type and model of proposed affected source:

Coating Pans manufactured by O'Hara Technologies and similar in design to the coating pans already installed at the facility. Specification sheet available upon request.

2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.

3. Name(s) and maximum amount of proposed process material(s) charged per hour:

Dry powder raw pharmaceutical materials will be mixed and formulated in quantities up to 750 pounds per hour in coating pan.

4. Name(s) and maximum amount of proposed material(s) produced per hour:

Dry powder raw pharmaceutical materials will be mixed and formulated in quantities up to 750 pounds per hour in coating pan.

5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:

None

\* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

6. Combustion Data (if applicable):					
(a) Type and amount in appropriate units of fuel(s) to be burned:					
Not Applicable					
(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:					
Not Applicable					
(c) Theoretical combustion air requirement (ACF/unit of fuel):					
N/A	@	°F and	psia.		
(d) Percent excess air: N/A					
(e) Type and BTU/hr of burners and all other firing equipment planned to be used:					
Not Applicable					
(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:					
Not Applicable					
(g) Proposed maximum design heat input: Not Applicable × 10 <sup>6</sup> BTU/hr.					
7. Projected operating schedule:					
Hours/Day	18	Days/Week	5.5	Weeks/Year	50

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@	Varies	°F and	Ambient	psia
a.	NO <sub>x</sub>	N/A	lb/hr	N/A grains/ACF
b.	SO <sub>2</sub>	N/A	lb/hr	N/A grains/ACF
c.	CO	N/A	lb/hr	N/A grains/ACF
d.	PM <sub>10</sub>	16.88	lb/hr	n/a grains/ACF
e.	Hydrocarbons	N/A	lb/hr	N/A grains/ACF
f.	VOCs	N/A	lb/hr	N/A grains/ACF
g.	Pb	N/A	lb/hr	N/A grains/ACF
h.	Specify other(s)			
	None	N/A	lb/hr	N/A grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing  
 Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

<p><b>MONITORING</b>          Quarterly visible emission observations (conducted on external cartridge collector)</p>	<p><b>RECORDKEEPING</b>          Maintain records of DC visual emission observations.</p>
---	---

<p><b>REPORTING</b>          N/A</p>	<p><b>TESTING</b>          N/A</p>
--	--

**MONITORING.** PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

Not applicable

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment M**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

**Attachment M**  
**Air Pollution Control Device Sheet**  
(BAGHOUSE)

Control Device ID No. (must match Emission Units Table): CC TBD (Coating Pan (TBD) (EP ID 247) )

**Equipment Information and Filter Characteristics**

1. Manufacturer: Donaldson Model No. DFO 3-12 Note: These collectors are cartridge style collectors		2. Total number of compartments: 1	
		3. Number of compartment online for normal operation: 1	
4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.			
5. Baghouse Configuration: <input type="checkbox"/> Open Pressure <input checked="" type="checkbox"/> Closed Pressure <input type="checkbox"/> Closed Suction (check one) <input type="checkbox"/> Electrostatically Enhanced Fabric <input type="checkbox"/> Other, Specify			
6. Filter Fabric Bag Material: <input type="checkbox"/> Nomex nylon <input type="checkbox"/> Wool <input type="checkbox"/> Polyester <input type="checkbox"/> Polypropylene <input type="checkbox"/> Acrylics <input type="checkbox"/> Ceramics <input type="checkbox"/> Fiber Glass <input type="checkbox"/> Cotton Weight      oz./sq.yd <input type="checkbox"/> Teflon Thickness      in <input checked="" type="checkbox"/> Others, specify Ultra-Web		7. Bag Dimension: Diameter      n/a      in. Length      n/a      ft.	
		8. Total cloth area: 2,280      ft <sup>2</sup>	
		9. Number of bags: 12 cartridges	
		10. Operating air to cloth ratio: n/a      ft/min	
11. Baghouse Operation: <input type="checkbox"/> Continuous <input type="checkbox"/> Automatic <input checked="" type="checkbox"/> Intermittent			
12. Method used to clean bags: <input type="checkbox"/> Mechanical Shaker <input type="checkbox"/> Sonic Cleaning <input type="checkbox"/> Reverse Air Jet <input type="checkbox"/> Pneumatic Shaker <input type="checkbox"/> Reverse Air Flow <input type="checkbox"/> Other: <input type="checkbox"/> Bag Collapse <input checked="" type="checkbox"/> Pulse Jet <input type="checkbox"/> Manual Cleaning <input type="checkbox"/> Reverse Jet			
13. Cleaning initiated by: <input checked="" type="checkbox"/> Timer <input type="checkbox"/> Frequency if timer actuated <input type="checkbox"/> Expected pressure drop range      in. of water <input type="checkbox"/> Other			
14. Operation Hours:      Max. per day: 24 Max. per yr: 8736		15. Collection efficiency:      Rating: 99.9      % Guaranteed minimum: 99.9      %	

**Gas Stream Characteristics**

16. Gas flow rate into the collector: 4,000      ACFM at      70-100°F and      PSIA ACFM: Design:      PSIA      Maximum:      PSIA      Average Expected:      PSIA	
17. Water Vapor Content of Effluent Stream:      lb. Water/lb. Dry Air	
18. Gas Stream Temperature:      70-100°F	19. Fan Requirements:      10      hp OR ft <sup>3</sup> /min
20. Stabilized static pressure loss across baghouse. Pressure Drop:      High      in. H <sub>2</sub> O Low      in. H <sub>2</sub> O	
21. Particulate Loading:      Inlet:      varies      grain/scf      Outlet:      varies      grain/scf	

22. Type of Pollutant(s) to be collected (if particulate give specific type):  
 Particulate from pharmaceutical powder processing operations

23. Is there any SO<sub>3</sub> in the emission stream?  No  Yes SO<sub>3</sub> content: \_\_\_\_\_ ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

Pollutant	IN		OUT	
	lb/hr	grains/acf	lb/hr	grains/acf
PM	16.88	-	0.84	-

25. Complete the table:

Particulate Size Range (microns)	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
	Weight % for Size Range	Weight % for Size Range
0 – 2	Varies by product	Varies by product
2 – 4	Varies by product	Varies by product
4 – 6	Varies by product	Varies by product
6 – 8	Varies by product	Varies by product
8 – 10	Varies by product	Varies by product
10 – 12	Varies by product	Varies by product
12 – 16	Varies by product	Varies by product
16 – 20	Varies by product	Varies by product
20 – 30	Varies by product	Varies by product
30 – 40	Varies by product	Varies by product
40 – 50	Varies by product	Varies by product
50 – 60	Varies by product	Varies by product
60 – 70	Varies by product	Varies by product
70 – 80	Varies by product	Varies by product
80 – 90	Varies by product	Varies by product
90 – 100	Varies by product	Varies by product
>100	Varies by product	Varies by product

26. How is filter monitored for indications of deterioration (e.g., broken bags)? <input type="checkbox"/> Continuous Opacity <input checked="" type="checkbox"/> Pressure Drop <input type="checkbox"/> Alarms-Audible to Process Operator <input checked="" type="checkbox"/> Visual opacity readings, Frequency: Quarterly <input type="checkbox"/> Other, specify:
27. Describe any recording device and frequency of log entries: None
28. Describe any filter seeding being performed: None
29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification): None
30. Describe the collection material disposal system: Material is collected in drums and incinerated off site.
31. Have you included <b>Baghouse Control Device</b> in the Emissions Points Data Summary Sheet?

**32. Proposed Monitoring, Recordkeeping, Reporting, and Testing**  
 Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

<p><b>MONITORING:</b>          Quarterly visual emission observations.</p>	<p><b>RECORDKEEPING:</b>          Maintain records of visual emission observations.</p>
--	---

<p><b>REPORTING:</b>          None</p>	<p><b>TESTING:</b>          None</p>
--	--

<p><b>MONITORING:</b></p>	<p>Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.</p>
<p><b>RECORDKEEPING:</b></p>	<p>Please describe the proposed recordkeeping that will accompany the monitoring.</p>
<p><b>REPORTING:</b></p>	<p>Please describe any proposed emissions testing for this process equipment on air pollution control device.</p>
<p><b>TESTING:</b></p>	<p>Please describe any proposed emissions testing for this process equipment on air pollution control device.</p>

**33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.**  
 100%

**34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.**  
 99.9%

**35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.**  
 TBD when unit arrives

THIS DOCUMENT CONTAINS INFORMATION THAT IS CONFIDENTIAL AND/OR PROPRIETARY TO DONALDSON COMPANY, INC. ALL RIGHTS TO DESIGN, COPY, REPRODUCE, MANUFACTURE FROM OR DISPOSE OF THIS DOCUMENT OR ITS CONTENTS ARE RESERVED UNLESS SPECIFIED IN WRITING BY DONALDSON.

DO NOT INSTALL OR OPERATE THIS EQUIPMENT UNTIL HAVING READ AND UNDERSTOOD THE INSTRUCTIONS AND WARNINGS IN THE INSTALLATION AND OPERATION MANUAL. FOR A REPLACEMENT MANUAL CONTACT DONALDSON COMPANY, INC. (800) 365-1331.

REV	DATE	REVISION DESCRIPTION	APPROVAL DATE

### APPROVAL PRINT

DATE SENT: 06/02/2016

- APPROVED
- APPROVED AS NOTED
- NOT APPROVED

APPROVER SIGNATURE: \_\_\_\_\_

APPROVER PRINTED NAME: \_\_\_\_\_

DATE: \_\_\_\_\_

RETURN ONE SIGNED COPY

PROPERTY OF:  
DONALDSON COMPANY, INC.

### SPECIFICATIONS FOR DFO 3-12

REMOTE TIMER	-----	120 VAC 50-60 HZ
NUMBER OF FILTERS	-----	12 ULTRA-WEB GALV
ACTUAL FILTER AREA	-----	2,280 SQ FT (211.8 sq m)
P-RED	-----	4 BAR
OPERATING TEMPERATURE	-----	180 DEGREE F (82°C) MAX
NUMBER OF VALVES	-----	6
COMPRESSED AIR REQUIRED	-----	10 SCFM @ 90-100 PSIG (17 m <sup>3</sup> /hr @ 6-7 bar)
HOUSING RATING	-----	-20" WC (-508 mmwG)
FINISH	-----	NATIONAL BLUE
APPROXIMATE WEIGHT	-----	2,650 LBS (1202 kg)

#### IBC 2012 SPECIFICATIONS

RISK CATEGORY II  
 BASIC WIND SPEED & EXPOSURE: 115 MPH (185 km/hr)  
 Exposure C, 3 sec gust  
 SEISMIC SPECTRAL ACCELERATION,  $S_s = 1.5$  &  $S_1 = 0.6$ , SITE CLASS D  
 GROUND SNOW LOAD,  $P_g = 40$  PSF (195 kg/m<sup>2</sup>)  
 ROOF LIVE LOAD  $L_r = 20$  PSF (98 kg/m<sup>2</sup>)  
 COLLECTOR BASE AT GRADE

#### EXPLOSION VENT

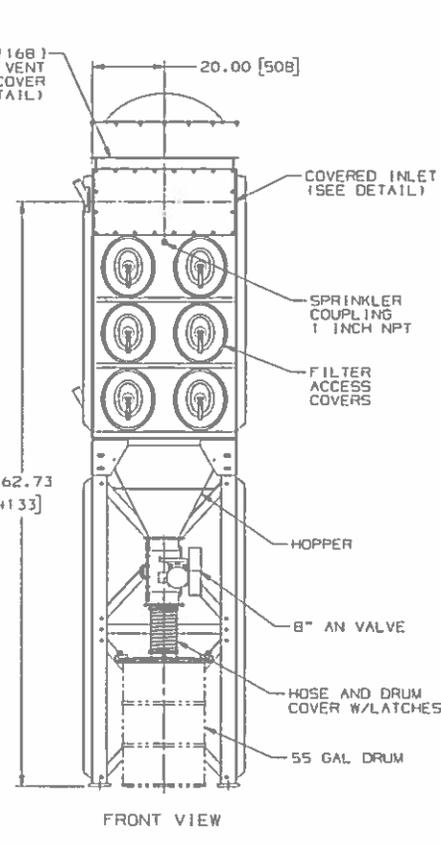
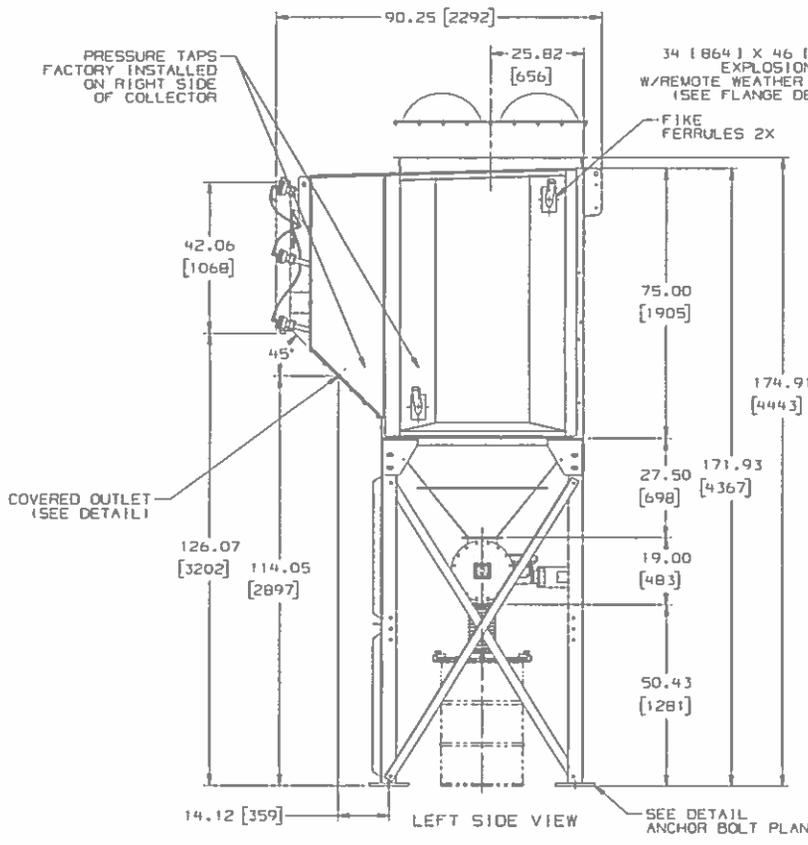
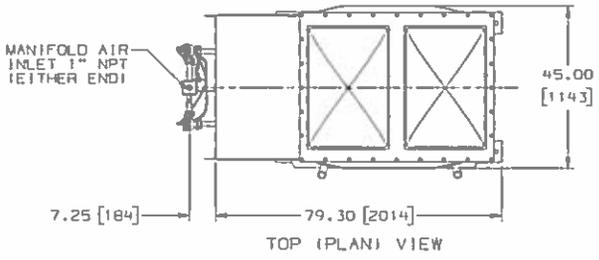
DONALDSON MEMBEX\*  
 NOMINAL SIZE: 34 X 47 (864 x 1194)  
 RELIEF AREA (TOP VENT): 7.99 FT<sup>2</sup>  
 NOMINAL BURST PRESSURE: 1.45 psig (0.1 bar)

#### NOTES:

1. THE SOLENOID ENCLOSURE IS RATED NEMA 7.
2. THIS COLLECTOR INCLUDES GRAIND TEST DOCUMENTATION.
3. THE FOLLOWING RATING APPLIES TO THIS DUST CONFIGURATION.  
 INDOORS EXPLOSION VENT DUCT MAX LENGTH: 38 INCH,  
 $K_{st} = 300$  bar-m/s and  $P_{max} = 10$  bar.  
 IF COLLECTOR IS USED OUTDOORS WITH NO DUCT LENGTH:  
 $K_{st} = 465$  bar-m/s and  $P_{max} = 12$  bar.

**OHARA**

MATERIAL	RELEASE NO.	114 DFO 3-12 EXPL VENT 8/FLANGE
DATE	EXP DATE	8 IN AN VALVE FIRE FERRULES
DESIGNER	DATE JUN 01, 2016	COVER 8/ LATCHES OHARA
REFERENCE	DATE JUN 01, 2016	NUMBER
	DATE JUN 01, 2016	1G10961297L001
	DATE JUN 01, 2016	SCALE NONE SHEET 1 OF 2
	DATE JUN 01, 2016	REVISION
	DATE JUN 01, 2016	0 IAF
	DATE JUN 01, 2016	SECTIONAL SIZE
	DATE JUN 01, 2016	QUALITY SIZE
	DATE JUN 01, 2016	DESIGN CONTROL ADDN (DWS) LOCATION A101
	DATE JUN 01, 2016	SECTION A
	DATE JUN 01, 2016	COPYRIGHT © DONALDSON COMPANY, INC.





22. Type of Pollutant(s) to be collected (if particulate give specific type):  
 Particulate from pharmaceutical powder processing operations

23. Is there any SO<sub>3</sub> in the emission stream?  No  Yes SO<sub>3</sub> content: ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

Pollutant	IN		OUT	
	lb/hr	grains/acf	lb/hr	grains/acf
PM	9.19	-	0.18	-

25. Complete the table:

Particulate Size Range (microns)	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
	Weight % for Size Range	Weight % for Size Range
0 – 2	Varies by product	Varies by product
2 – 4	Varies by product	Varies by product
4 – 6	Varies by product	Varies by product
6 – 8	Varies by product	Varies by product
8 – 10	Varies by product	Varies by product
10 – 12	Varies by product	Varies by product
12 – 16	Varies by product	Varies by product
16 – 20	Varies by product	Varies by product
20 – 30	Varies by product	Varies by product
30 – 40	Varies by product	Varies by product
40 – 50	Varies by product	Varies by product
50 – 60	Varies by product	Varies by product
60 – 70	Varies by product	Varies by product
70 – 80	Varies by product	Varies by product
80 – 90	Varies by product	Varies by product
90 – 100	Varies by product	Varies by product
>100	Varies by product	Varies by product

26. How is filter monitored for indications of deterioration (e.g., broken bags)?

- Continuous Opacity
- Pressure Drop
- Alarms-Audible to Process Operator
- Visual opacity readings, Frequency: Quarterly
- Other, specify:

27. Describe any recording device and frequency of log entries:

None

28. Describe any filter seeding being performed:

None

29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):

None

30. Describe the collection material disposal system:

Material is collected in drums and incinerated off site.

31. Have you included **Baghouse Control Device** in the Emissions Points Data Summary Sheet?

**32. Proposed Monitoring, Recordkeeping, Reporting, and Testing**

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING:  
Quarterly visual emission observations.

RECORDKEEPING:  
Maintain records of visual emission observations.

REPORTING:  
None

TESTING:  
None

MONITORING: Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.  
RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.  
REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.  
TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.  
100%

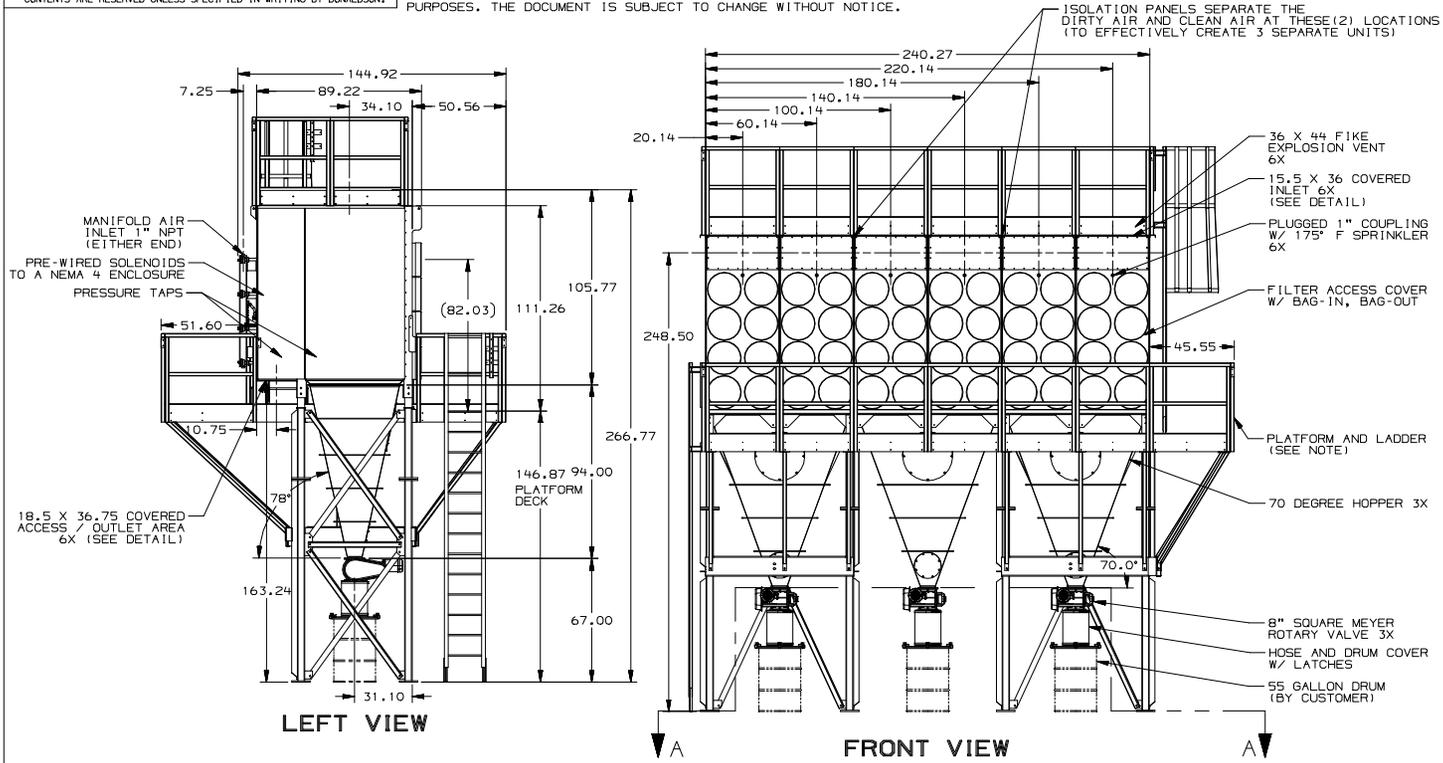
34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.  
99.9%

35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.  
TBD when unit arrives

THIS DOCUMENT CONTAINS INFORMATION THAT IS CONFIDENTIAL AND/OR PROPRIETARY TO DONALDSON COMPANY, INC. ALL RIGHTS TO DISCLOSE, COPY, REPRODUCE, MANUFACTURE FROM OR DISPOSE OF THIS DOCUMENT OR ITS CONTENTS ARE RESERVED UNLESS SPECIFIED IN WRITING BY DONALDSON.

DO NOT INSTALL OR OPERATE THIS EQUIPMENT UNTIL YOU HAVE READ AND UNDERSTOOD THE INSTRUCTIONS AND WARNINGS IN THE INSTALLATION AND OPERATION MANUAL. THIS PRINT IS NOT CERTIFIED FOR CONSTRUCTION PURPOSES. THE DOCUMENT IS SUBJECT TO CHANGE WITHOUT NOTICE.

DWG NO.	REV	ZONE	REVISION DESCRIPTION	APPROVAL/DATE
	1		ADDED WRAP AROUND AND ROOF PLATFORM, TIE OFFS, VENT COVERS, LOWER HOPPER ACCESS AND 300 KST NOTE.	TAH SEP 07, 2016



### SPECIFICATIONS DFT 4-96

REMOTE TIMER	110 VAC 50-60 HZ
NUMBER OF FILTERS	96 ULTRA-WEB NL
ACTUAL FILTER AREA	24,394 SQ FT
P-RED	.4 BAR
OPERATING TEMPERATURE	180 DEGREE F MAXIMUM
NUMBER OF VALVES	48
COMPRESSED AIR REQUIRED	20 SCFM @ 90-100 PSIG
HOUSING RATING	30" WC
FINISH	NATIONAL BLUE
APPROXIMATE WEIGHT	18,800 POUNDS

IBC 2012 & ASCE 7-10 SPECIFICATION

OCCUPANCY CATEGORY H-2  
 BASIC WIND SPEED & EXPOSURE: 115 MPH, EXPOSURE C  
 SEISMIC SPECTRAL ACCELERATION,  $S_s=0.11$  &  $S_1=0.06$   
 SITE CLASS D  
 GROUND SNOW LOAD,  $P_g=40$  PSF  
 ROOF LIVE LOAD,  $L=20$  PSF  
 COLLECTOR BASE AT 90 FT ELEVATION

- NOTE**
1. THIS COLLECTOR INCLUDES GROUND TEST DOCUMENTATION.
  2. THIS COLLECTOR INCLUDES A SPARE PARTS KIT.
  3. THIS COLLECTOR INCLUDES A BASIC COLD CLIMATE KIT.
  4. THE SOLENOIDS INCLUDE MUFFLERS.
  5. PLATFORM AND LADDER ARE PAINTED SAFETY YELLOW.
  6. THIS COLLECTOR IS RATED FOR 300 KST.

**\*\*NOTE\*\***

THIS DRAWING HAS BEEN SENT TO OUR CALCULATIONS GROUP FOR ANALYSIS. PLATFORM BRACING AND LEG STRUCTURE COULD VARY FROM WHAT IS SHOWN.

**APPROVAL PRINT**

DATE SENT: 09/07/2016

APPROVED  
 APPROVED AS NOTED  
 NOT APPROVED

APPROVER SIGNATURE: \_\_\_\_\_

APPROVER PRINTED NAME: \_\_\_\_\_

DATE: \_\_\_\_\_

RETURN ONE SIGNED COPY

PROPERTY OF:  
 DONALDSON COMPANY, INC.

### MYLAN PHARMACEUTICALS INC

MATERIAL	RELEASE NO.	TITLE DFT 4-96 DUST COLLECTOR	
DATE	EXP DATE	NUMBER	
REFERENCE	DWN T HECHT	IG11055964L001	
DATE JUL 22, 2016	CHK B GOOSSEN	SCALE NONE SHEET 1 OF 2 REVISION	
PREVIOUS DRAWING NO.	APVD	C/C	Donaldson Co., Inc. Minneapolis, MN USA IAF
DATE	THIRD ANGLE PROJECTION	SECTIONAL SIZE OUTLINE SIZE	DESIGN CONTROL AS01 DWG LOCATION A888 VERSION A COPYRIGHT © DONALDSON COMPANY, INC. L10

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment N**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

## ATTACHMENT N – SUPPORTING EMISSIONS CALCULATIONS

The attached spreadsheets contain the estimated maximum hourly and annual emission rates for the new coating pan and the new dust collector associated with the coating pan and the installation of a new production rooms exhaust air dust collector.

1. A new coating pan is being installed due to new product forecasts and production requirements. The coating pan will be capable of applying aqueous based solutions to tablets. The associated dust collector will be installed to capture particulate emissions from tablet breakage or solution overspray.
2. A new cartridge collector will control emissions generated from production rooms during manufacturing. An estimated 1% of the pharmaceutical powder is removed from the production room through general and local ventilation exhaust. These particulate emissions will be controlled by the cartridge collector.

Plant: Mylan Pharmaceuticals Inc. - Morgantown, WV (WVDAQ ID# 06100033)

Reason for Application: New Coating Pan

Process/Equipment Affected: New Coating Pan 247 w/associated Dust Collector

ID No.	Emission Unit Description	Design Capacity	Vent/Stack ID No.	Type of Release [1]	Control System	Control System ID No.	Control System Efficiency (%)	Pollutant	HAP?	Emission Estimate Basis [2]	Hourly Rate without Control Device (lb/hr)	Hourly Rate with Control Device (lb/hr)	Hours Oper. (hr/yr)	Annual Rate (ton/yr)
247	Coating Pan - Particulate Matter	750 lb/hr dry raw materials	247	P	Dust Collector	TBD	95	Total PM	N	MB	16.88	0.84	varies	6.25 all coating pans

**BASIS FOR EMISSION ESTIMATES:**

**1. PARTICULATE MATTER**

- a. Maximum dry raw material load to coating pans is 310 kg/hr (682 lb/hr) per manufacturer's specifications.
- b. An estimated 1.5% of dry material is lost from the coating pan due to tablet breakage and overspray.
- c. Estimated upset factor: 1.5
- d. Maximum coating pan load is 750 lb.
- e. Material Loss = 750 lb/hr \* 1.5% \* 1.5 = 16.88 lb/hr
- f. Dust collector removes approximately 95% of total PM

**NOTES:**

[1] P=Point, F=Fugitive, S=Secondary

[2] EF=Emission Factor, MB=Material Balance, EN=Engineering Calculation, MO=Monitoring/Measurement

Plant: Mylan Pharmaceuticals Inc. - Morgantown, WV (WVDAQ ID# 06100033)

Reason for Application: Cartridge Collector Installation

Process/Equipment Affected: Production Rooms Exhausted Through Cartridge Collector

ID No.	Emission Unit Description	Design Capacity	Vent/Stack ID No.	Type of Release [1]	Control System	Control System ID No.	Control System Efficiency (%)	Pollutant	HAP?	Emission Estimate Basis [2]	Each Cartridge Collector Hours Oper. (hr/yr)	Each Cartridge Collector Hourly Rate (lb/hr)	Each Cartridge Collector Annual Rate (tons/yr)
TBD	General ventilation from pharmaceutical manufacturing rooms	varies	324	P	Cartridge Collector	N/A	98%	PM	N	MB	6300.0	0.18	0.58

**BASIS FOR EMISSION ESTIMATES:**

**1. PARTICULATE MATTER (PM)**

- a. The cartridge collector is not an emission unit. The exhaust for the pharmaceutical manufacturing processing room general ventilation is controlled by the cartridge collector prior to emission to the atmosphere.
- b. The maximum amount processed is based on operating 4 coaters, one blender and one tablet press and mixing 4 solutions totalling 1000kg of powder in a 24 hour time period.  
 $Maximum\ processing\ rate = (1000\ kg) / (24\ hrs) * (2.205\ lb/kg) * (10\ rooms) = 919\ lb/hr$
- c. The typical maximum amount of unaccounted powder is 2%. It is assumed that of the 2% lost, 1% is air-borne. The other 1% clings to equipment, vacuum lines, collected as waste, etc.
- d. Apply cartridge collector efficiency of 98% for total PM.
- e. Actual powder processing takes place at a max of 18 hours/day, 5 days/week, 50 weeks/year.
- f. Cartridge Collector Hourly Rate =  $(919\ lb/hr) * (0.01) * (1-0.98) = 0.18\ lb/hr$
- g. Cartridge Collector Annual Rate =  $(919\ lb/hr) * (0.01) * (1-0.98) * (4500\ hr/yr) * (1\ ton / 2000\ lb) = 0.58\ tons/yr$

**NOTES:**

[1] P=Point, F=Fugitive, S=Secondary

[2] EF=Emission Factor, MB=Material Balance, EN=Engineering Calculation, MO=Monitoring/Measurement

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment P**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

## **ATTACHMENT P – PUBLIC NOTICE**

Mylan will submit the required Class I legal advertisement to a local newspaper and will forward the original affidavit of publication to DAQ within 30 days of submittal of this construction application.

The anticipated text of the legal ad to be placed in the *Morgantown Dominion-Post* is as follows:

### **AIR QUALITY PERMIT NOTICE Notice of Application**

Notice is given that Mylan Pharmaceuticals Inc. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Permit Modification for a pharmaceutical manufacturing facility located on 781 Chestnut Ridge Road, Morgantown, in Monongalia County, West Virginia. The latitude and longitude coordinates are: 39.65923, -79.95824

The applicant estimates an increase of potential to discharge the following Regulated Air Pollutants will be:

- 0.58 tons per year (tpy)

Startup of operation is planned to begin on or about the 17th day of April, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 24th day of February, 2017.

By: Mylan Pharmaceuticals Inc.  
John Sylvester  
Head of OSD Site Operations  
P.O. Box 4310  
Morgantown, WV 26504-4310

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Attachment S**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

**Attachment S**  
**Title V Permit Revision Information**

<b>1. New Applicable Requirements Summary</b>	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) <sup>(1)</sup>
<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)
<p><sup>(1)</sup> If this box is checked, please include <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why <b>Compliance Assurance Monitoring</b> is not applicable:</p> <p style="padding-left: 40px;">Per 40 CFR 64.5, this application is not part of an initial Title V permit application (40 CFR 64.5(a)(1)) and not part of a significant Title V permit revision (40 CFR 64.5(a)(2)); therefore, CAM plan submittal is not required until the renewal of Mylan's Title V permit as stated in 40 CFR 64.5(a)(3).</p>	

<b>2. Non Applicability Determinations</b>
<p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p> <p>The regulatory discussion outlining non-applicable air quality requirements are contained in Attachment D of this permit application.</p>
<input type="checkbox"/> <b>Permit Shield Requested</b> <i>(not applicable to Minor Modifications)</i>
<i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i>
<b>3. Suggested Title V Draft Permit Language</b>

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision?  Yes  No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

**4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision**

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-2068S	10/21/2016	
R30-06100033-2017	Awaiting issuance	
	/ /	

**5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision**

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

**6. Change in Potential Emissions**

Pollutant	Change in Potential Emissions (+ or -), TPY
PM	+0.58 tpy

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

**7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)**

**Note:** This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):	 (Please use blue ink)	Date:	02 / 24 / 2017 (Please use blue ink)
Named (typed):	John Sylvester	Title:	Head of OSD Site Operations

**Note: Please check if the following included (if applicable):**

- |                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | Compliance Assurance Monitoring Form(s) |
| <input checked="" type="checkbox"/> | Suggested Title V Draft Permit Language |

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Appendix 1**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

# Permit Update



**R13-2068****TS**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*

**Mylan Pharmaceuticals Inc.**  
**Chestnut Ridge Facility**  
**061-00033**

---

*William F. Durham*  
*Director*

*Issued: October 27, 2016*

*This permit will supersede and replace Permit R13-2068SR issued on ~~November 03, 2015~~ October 27, 2017.*

Facility Location: Morgantown, Monongalia County, West Virginia  
Mailing Address: 781 Chestnut Ridge Road, Morgantown, WV 26504  
Facility Description: Pharmaceutical Manufacturing Facility  
NAICS Codes: 325412  
UTM Coordinates: 589.6 km Easting • 4,390.1 km Northing • Zone 17  
Latitude/Longitude: 39.65913/-79.95824  
Permit Type: Class II Administrative Update  
Description of Change: • The addition of 2 new equipment pieces:

- ~~Fluid Bed 24410 Coating Pan (TBD583; 583) and associated New Cartridge type Dust Collector (CC TBD10024247).~~
- ~~Natural gas fired (6.0 MM Btu/hr) Boiler 24524 (016; 016). Production rooms exhaust Cartridge type Dust Collector (CC TBD).~~
- ~~The replacement of 3 old cartridge style dust collectors with 3 Cartridge Dust Collectors:~~

~~New CC 10024047 (replacing old CC EF527) for existing Fluid Bed 527 (533; 533).~~

~~New CC 10024526 (replacing old CC EF7674) and New CC 10024525 (replacing old CC 8422) for 2 existing Coating Pans: 7552 (244; 244) and 8421 (245; 245).~~

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.*

*The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.*

<b>Table of Contents</b>	<b>1.0</b>	<b>Emission Units</b>	<b>5</b>
(1) CC = Cartridge Collector; WS = Wet Scrubber; RTO = Regenerative Thermal Oxidizer			<b>9</b>
(2) Noted Emissions Units/Sources are authorized to exhaust (after the Cartridge Collector) to the RTO/Absorber (as applicable) and to atmosphere.	<b>2.0. General Conditions</b>		<b>9</b>
2.1. Definitions			10
2.2. Acronyms			10
2.3. Authority			11
2.4. Term and Renewal			11
2.5. Duty to Comply			11
2.6. Duty to Provide Information			11
2.7. Duty to Supplement and Correct Information			12
2.8. Administrative Update			12
2.9. Permit Modification			12
2.10. Major Permit Modification			12
2.11. Inspection and Entry			12
2.12. Emergency			12
2.13. Need to Halt or Reduce Activity Not a Defense			13
2.14. Suspension of Activities			13
2.15. Property Rights			13
2.16. Severability			13
2.17. Transferability			14
2.18. Notification Requirements			14
2.19. Credible Evidence			14
<b>3.0. Facility-Wide Requirements</b>			<b>15</b>
3.1. Limitations and Standards			15
3.2. Monitoring Requirements			15
3.2.1. The facility shall monitor on a monthly and yearly basis facility-wide HAP usage.			
Yearly HAP			15
3.3. Testing Requirements			16
3.4. Recordkeeping Requirements			17
3.5. Reporting Requirements			17
<b>4.0. Source-Specific Requirements [All Emission Units listed in Section 1.0]</b>			<b>19</b>
4.1. Limitations and Standards			19
4.2. Recordkeeping Requirements			19
<b>5.0. Source-Specific Requirements [Boilers - Emission point ID(s): 007, 008, 010, 011, 012, 013 &amp; 016]</b>			<b>20</b>
5.1. Limitations and Standards			20
5.2. Monitoring Requirements			22
5.5. Reporting Requirements			23
6.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. [45CSR§7-3.1]			<b>23</b>
<b>6.5. Reporting Requirements</b>			<b>26</b>
<b>7.1. Limitations and Standards</b>			<b>26</b>
<b>1.0. Emission Units</b>			<b>4</b>
<b>2.0. General Conditions</b>			<b>9</b>

2.1.	Definitions	9
2.2.	Aeronyms	9
2.3.	Authority	10
2.4.	Term and Renewal	10
2.5.	Duty to Comply	10
2.6.	Duty to Provide Information	10
2.7.	Duty to Supplement and Correct Information	11
2.8.	Administrative Permit Update	11
2.9.	Permit Modification	11
2.10.	Major Permit Modification	11
2.11.	Inspection and Entry	11
2.12.	Emergency	11
2.13.	Need to Halt or Reduce Activity Not a Defense	12
2.14.	Suspension of Activities	12
2.15.	Property Rights	12
2.16.	Severability	12
2.17.	Transferability	13
2.18.	Notification Requirements	13
2.19.	Credible Evidence	13
<b>3.0.</b>	<b>Facility Wide Requirements</b>	<b>14</b>
3.1.	Limitations and Standards	14
3.2.	Monitoring Requirements	14
3.3.	Testing Requirements	15
3.4.	Recordkeeping Requirements	16
3.5.	Reporting Requirements	16
<b>4.0.</b>	<b>Source Specific Requirements (All Emission Units listed in Section 1.0)</b>	<b>18</b>
4.1.	Limitations and Standards	18
4.2.	Recordkeeping Requirements	18
<b>5.0.</b>	<b>Source Specific Requirements (Boilers 007, 008, 010, 011, 012, 013 &amp; 016)</b>	<b>19</b>
5.1.	Limitations and Standards	19
5.2.	Monitoring Requirements	21
5.3.	Testing Requirements	22
5.4.	Recordkeeping Requirements	22
5.5.	Reporting Requirements	22
<b>6.0.</b>	<b>Source Specific Requirements (Fluid Beds 533 – 538 &amp; 571 – 583)</b>	<b>22</b>
6.1.	Limitations and Standards	22
6.2.	Monitoring Requirements	23
6.3.	Testing Requirements	25
6.4.	Recordkeeping Requirements	25
6.5.	Reporting Requirements	25
<b>7.0.</b>	<b>Source Specific Requirements (Production Rooms)</b>	<b>25</b>
7.1.	Limitations and Standards	25
7.2.	Monitoring Requirements	26
7.3.	Testing Requirements	27
7.4.	Recordkeeping Requirements	27
7.5.	Reporting Requirements	27
<b>8.0.</b>	<b>Source Specific Requirements (Coating Pans 215, 241, 242 &amp; 244, 245 &amp; 246)</b>	<b>27</b>
8.1.	Limitations and Standards	27
8.2.	Monitoring Requirements	29
8.3.	Testing Requirements	30
8.4.	Recordkeeping Requirements	30
8.5.	Reporting Requirements	30
<b>9.0.</b>	<b>Source Specific Requirements (Regenerative Thermal Oxidizer (RTO))</b>	<b>30</b>
9.1.	Limitations and Standards	30
9.2.	Monitoring Requirements	32
9.3.	Testing Requirements	33
9.4.	Recordkeeping Requirements	33
9.5.	Reporting Requirements	33
<b>10.0.</b>	<b>Source Specific Requirements (Oven Dryers 260, 261 and 264)</b>	<b>33</b>
10.1.	Limitations and Standards	33
10.2.	Monitoring Requirements	34
10.3.	Testing Requirements	34

10.4.	Recordkeeping Requirements.....	34
10.5.	Reporting Requirements.....	34
<b>11.0.</b>	<b>Source Specific Requirements (Absorber).....</b>	<b>34</b>
11.1.	Limitations and Standards.....	34
11.2.	Monitoring Requirements.....	35
11.3.	Testing Requirements.....	35
11.4.	Recordkeeping Requirements.....	35
11.5.	Reporting Requirements.....	35
<b>12.0.</b>	<b>Source Specific Requirements (Coating Line).....</b>	<b>35</b>
12.1.	Limitations and Standards.....	35
12.2.	Monitoring Requirements.....	36
12.3.	Testing Requirements.....	36
12.4.	Recordkeeping Requirements.....	36
12.5.	Reporting Requirements.....	36
	<b>CERTIFICATION OF DATA ACCURACY.....</b>	<b>37</b>

**1.0. Emission Units**

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device<sup>(1)</sup></b>
007	007	Boiler 007: Natural Gas Boiler, Bryan Steam Corp.	1997	6.99 MMBtu/hr	None
008	008	Boiler 008: Natural Gas Boiler, Bryan Steam Corp.	1997	6.99 MMBtu/hr	None
010	010	Boiler 015: Natural Gas Boiler, Bryan Steam Corp.	2004	7.0 MMBtu/hr	None
011	011	Boiler 2343: Natural Gas Boiler	2005	21.0 MMBtu/hr	None
012	012	Boiler 2344: Natural Gas Boiler	2005	21.0 MMBtu/hr	None
013	013	Boiler 2345: Natural Gas Boiler	2005	21.0 MMBtu/hr	None
016	016	Boiler 24524: Natural Gas Boiler	2016	6.0 MM Btu/hr	None
Rooms BL209, BL211, BL214, BL304, BL306, BL307, BL309 - BL314, BL316, BL402 - BL404, BL406 - BL414, BL416	287	Room General Exhaust	1996	Varies	Rotoclone 6
Rooms BB101 – BB103, BB106, BB108 - BB111, BB113 - BB118, BB201 - BB203, BB206 - BB208, BB210 - BB217, BB303, BB312	288	Room General Exhaust	1996	Varies	Rotoclone 5
Rooms 99-105, 99-114 - 99-122, 99-209, 85-205A - 85-208A, ORG201A-ORG204A	291	Room General Exhaust	1999	Varies	Rotoclone 7
Rooms BB112, 85-106, 85-108, 85-114, 85-115, 85-102, 85-104, 85-107, 85-110	294	Room General Exhaust	2003	Varies	Rotoclone 9
Rooms BL218, BL219	295	Room General Exhaust	2004	Varies	Rotoclone 10
Rooms NEX140, NEX142, NEX144, NEX146, NEX159 - NEX162	296	Room General Exhaust	2005	Varies	Rotoclone 2317

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device<sup>(1)</sup></b>
Rooms NEX139, NEX141, NEX143, NEX145, NEX152 - NEX158, NEX163, NEX164	297	Room General Exhaust	2005	Varies	Rotoclone 2318
Rooms NEX131 - NEX136, NEX138, NEX147, NEX148	298	Room General Exhaust	2005	Varies	Rotoclone 2319
Rooms NEX175, NEX177, NEX179, NEX181, NEX183	299	Room General Exhaust	2005	Varies	Rotoclone 2320
Rooms NEX176, NEX178, NEX180, NEX182, NEX186 - NEX189	300	Room General Exhaust	2005	Varies	Rotoclone 2321
Rooms NEX231, NEX232, NEX234, NEX275-NEX283, NEX286-NEX289	305	Room General Exhaust	2005	Varies	Rotoclone 2322
Rooms NEX211A-NEX217A	306	Room General Exhaust	2005	Varies	Rotoclone 2323
Rooms NEX372, NEX374, NEX376, NEX378, NEX380	307	Room General Exhaust	2005	Varies	Rotoclone 2324
Rooms NEX349, NEX362, NEX364, NEX366, NEX368, NEX369	308	Room General Exhaust	2005	Varies	Rotoclone 2325
Rooms NEX346, NEX355, NEX357, NEX359 - NEX361	309	Room General Exhaust	2005	Varies	Rotoclone 2326
Rooms NEX375, NEX377, NEX379, NEX381	310	Room General Exhaust	2005	Varies	Rotoclone 2327
Rooms NEX 216A, NEX217A, NEX535-NEX538	311	Room General Exhaust	2005	Varies	Rotoclone 2328
Rooms NEX321 - NEX330, NEX421-NEX430	312	Room General Exhaust	2005	Varies	Rotoclone 2329
Rooms NEX303, NEX405 - NEX412	313	Room General Exhaust	2005	Varies	Rotoclone 2330
Rooms NEX468, NEX469, NEX472 - NEX480	314	Room General Exhaust	2005	Varies	Rotoclone 2331

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device<sup>(1)</sup></b>
Rooms NEX435 - NEX438, NEX413 - NEX416, NEX419	315	Room General Exhaust	2005	Varies	Rotoclone 2332
Rooms NEX464 - NEX467, NEX481, NEX482, NEX484 - NEX492	316	Room General Exhaust	2005	Varies	Rotoclone 2333
Rooms NEX305- NEX312, NEX316	317	Room General Exhaust	2005	Varies	Rotoclone 2334
Rooms NEX445B, NEX445C, NEX445D, NEX445E, NEX445F, NEX445G	318	Room General Exhaust	2005	Varies	Rotoclone 2335
Rooms NEX514, NEX516A-D, NEX522 -NEX524, NEX526, NEX528, NEX530, NEX535 - NEX538	319	Room General Exhaust	2005	Varies	Rotoclone 2336
Rooms NEX503, NEX505, NEX507, NEX509, NEX511, NEX513	320	Room General Exhaust	2005	Varies	Rotoclone 2337
Rooms NEX506, NEX508, NEX510, NEX512, NEX 515	321	Room General Exhaust	2005	Varies	Rotoclone 2338
Rooms 74-174, 74-175, 74-176, 74-177, 74-179, 74-179A, 74-180, 74-180A	322	Room General Exhaust	2012	Varies	CC 17034
Rooms 74-150, 74-152, 74-154, 74-159, 74-160, 74-161, 74-162, 74-212, 91-232, 91-233	282	Room General Exhaust	2013	Varies	Rotoclone 3798
Rooms 87-103 to 87-117	323	Room General Exhaust	2014	Varies	CC 10023125
<u>Rooms 74-101 to 74-110</u>	<u>324</u>	<u>Room General Exhaust</u>	<u>2017</u>	<u>Varies</u>	<u>CC TBD</u>
533	533	Fluid Bed 527	1991	Up to 575 Kg/Load	CC 10024047
534	534, 10008085 <sup>(2)</sup>	Fluid Bed 473	1997	Up to 250 Kg/Load	CC EF473; RTO
535	535	Fluid Bed 1339	1997	Up to 575 Kg/Load	CC EF1339
536	536	Fluid Bed 1222	1997	Up to 250 Kg/Load	CC EF1222

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device<sup>(4)</sup></b>
537	537	Fluid Bed 1552	1997	Up to 575 Kg/Load	CC EF1552
538	538, 10008085 <sup>(2)</sup>	Fluid Bed 1855	2002	Up to 250 Kg/Load	CC EF2113; RTO
571	571	Fluid Bed 2113	2004	Up to 575 Kg/Load	CC EF2113
572	572, 10008085 <sup>(2)</sup>	Fluid Bed 2181	2004	Up to 250 Kg/Load	CC EF2181; RTO
573	573, 10008538 <sup>(2)</sup>	Fluid Bed 2811	2006	Up to 575 Kg/Load	CC 3340; Absorber
574	574, 10008085 <sup>(2)</sup>	Fluid Bed 3287	2006	Up to 250 Kg/Load	CC 3416; RTO
575	575, 10008085 <sup>(2)</sup>	Fluid Bed 3620	2007	Up to 250 Kg/Load	CC 3643; RTO
576	576, 10008085 <sup>(2)</sup>	Fluid Bed 3426	2007	Up to 575 Kg/Load	CC 3407; RTO
577	577, 10008085 <sup>(2)</sup>	Fluid Bed 3704	2008	Up to 250 Kg/Load	CC 3881; RTO
578	578, 10008085 <sup>(2)</sup>	Fluid Bed 3705	2008	Up to 575 Kg/Load	CC 3879; RTO
579	579, 10008538 <sup>(2)</sup>	Fluid Bed 4001	2008	Up to 575 Kg/Load	CC 4287; Absorber
580	580, 10008085 <sup>(2)</sup>	Fluid Bed 7560	2010	Up to 575 Kg/Load	CC 10007482; RTO
581	581	Fluid Bed 15982	2011	Up to 250 Kg/Load	CC 15982
582	582	Fluid Bed 16117	2011	Up to 575 Kg/Load	CC 16117
583	583	Fluid Bed 24410	2016	Up to 575 Kg/Load	CC 10024247
215	215	Coating Pan 1390	1999	750 lbs/load	CC EF1390
241	241	Coating Pan 4549	2009	750 lbs/load	CC EF4553
242	242	Coating Pan 4027	2008	245 lbs/load	CC EF4101
244	244, 10008085 <sup>(2)</sup>	Coating Pan 7552	2010	750 lbs/load	CC 10024526; RTO

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device <sup>(1)</sup>
245	245, 10008085 <sup>(2)</sup>	Coating Pan 8421	2010	750 lbs/load	CC 10024525; RTO
246	246, 10008085 <sup>(2)</sup>	Coating Pan 2358 <sub>1</sub>	2015	750 lbs/load	CC 23583; RTO
<u>247</u>	<u>247</u>	<u>Coating Pan (TBD)</u>	<u>2017</u>	<u>750 lbs/load</u>	<u>CC TBD;</u>
260	260, 10008085 <sup>(2)</sup>	Oven 19	<1973	Electric, Load Varies	RTO
261	261, 10008085 <sup>(2)</sup>	Oven 18	<1973	Electric, Load Varies	RTO
264	264, 10008085 <sup>(2)</sup>	Oven 0021	2013	Electric, Load Varies	RTO
1911	1911, 10008085 <sup>(2)</sup>	Coating Line 1911	2014	10.77 lb/hr	RTO
10008085	10008085	Regenerative Thermal Oxidation	2010	16.0 mmBtu/hr 3,070 lbs/hr	None
10008538	10008538	Absorber	2010	4,000 cfm	None

(1) CC = Cartridge Collector; WS = Wet Scrubber; RTO = Regenerative Thermal Oxidizer

(2) Noted Emissions Units/Sources are authorized to exhaust (after the Cartridge Collector) to the RTO/Absorber (as applicable) and to atmosphere.

## 2.0. General Conditions

### 2.1. Definitions

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5 µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>CO</b>	Carbon Monoxide	<b>Ppb</b>	Pounds per Batch
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>Pph</b>	Pounds per Hour
<b>DAQ</b>	Division of Air Quality	<b>Ppm</b>	Parts per Million
<b>DEP</b>	Department of Environmental Protection	<b>Ppmv or ppmv</b>	Parts per Million by Volume
<b>dscm</b>	Dry Standard Cubic Meter	<b>PSD</b>	Prevention of Significant Deterioration
<b>FOIA</b>	Freedom of Information Act	<b>Psi</b>	Pounds per Square Inch
<b>HAP</b>	Hazardous Air Pollutant	<b>SIC</b>	Standard Industrial Classification
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>M</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>MDHI</b>	Maximum Design Heat Input	<b>USEPA</b>	United States Environmental Protection Agency
<b>MM</b>	Million	<b>UTM</b>	Universal Transverse Mercator
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>NA</b>	Not Applicable	<b>VOL</b>	Volatile Organic Liquids
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		

### **2.3. Authority**

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

### **2.4. Term and Renewal**

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-2068R. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2068 through R13-2068K, R13-2068M through R13-2068R, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
**[45CSR§§13-5.11 and -10.3.]**
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### **2.6. Duty to Provide Information**

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

**2.7. Duty to Supplement and Correct Information**

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

**2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4.]

**2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

**2.10 Major Permit Modification**

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

**2.11. Inspection and Entry**

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

**2.12. Emergency**

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

**2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

**2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

**2.15. Property Rights**

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

**2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

**2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13.  
[45CSR§13-10.1.]

**2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

**2.19. Credible Evidence**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.  
**[45CSR§6-3.1.]**
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
**[45CSR§6-3.2.]**
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
**[40CFR§61.145(b) and 45CSR§34]**
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
**[45CSR§4-3.1] [State Enforceable Only]**
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
**[45CSR§13-10.5.]**
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.  
**[45CSR§11-5.2.]**
- 3.1.7. Facility-wide emissions to the atmosphere of Hazardous Air Pollutants (HAPs) shall not exceed or equal 9.4 tons per year of any single HAP or 24.4 tons per year of any combination of HAPs. Yearly total HAPs will be determined using a 12-month rolling total.

#### 3.2. Monitoring Requirements

- 3.2.1. The facility shall monitor on a monthly and yearly basis facility-wide HAP usage. Yearly HAP calculations shall be based on a 12-month rolling total.

### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
  - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
  - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
  - d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
    1. The permit or rule evaluated, with the citation number and language;
    2. The result of the test for each permit or rule condition; and,
    3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

### 3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.  
**[45CSR§4. State Enforceable Only.]**
- 3.4.3. To demonstrate compliance with the facility-wide HAP limits, the permittee shall maintain monthly and yearly records of facility-wide HAP usage. The facility shall prepare monthly facility-wide calculations of the amount of each individual HAP emitted and the amount of aggregated HAPs emitted. Yearly HAP calculations shall be based on a 12-month rolling total.

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**If to the DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57th Street  
Charleston, WV 25304-2345

**If to the US EPA:**

Associate Director  
Office of Air Enforcement and Compliance Assistance (3AP20)  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**3.5.4. Operating Fee**

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

#### 4.0. Source-Specific Requirements [All Emission Units listed in Section 1.0]

##### 4.1. Limitations and Standards

- 4.1.1. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.  
[45CSR§13-5.11.]

##### 4.2. Recordkeeping Requirements

- 4.2.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.2.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.2.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
  - b. Steps taken to minimize emissions during the event.
  - c. The duration of the event.
  - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.

- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

**5.0. Source-Specific Requirements [Boilers - Emission point ID(s): 007, 008, 010, 011, 012, 013 & 016]**

**5.1. Limitations and Standards**

- 5.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. [45CSR§2-3.1] (007, 008, 010, 011, 012, 013, 016)
- 5.1.2. Compliance with the visible emission requirements of 45CSR2 subsection 3.1 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of subsection 3.1. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control. [45CSR§2-3.2] (007, 008, 010, 011, 012, 013, 016)
- 5.1.3. No person shall cause, suffer, allow or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:

**Table 5.1.3.: Fuel Burning Unit 45CSR2 PM Limits**

Emission Unit	PM Emission Limit (lb/hr)
011	1.89
012	1.89
013	1.89

Compliance with 45CSR§2-4.1.b shall be demonstrated through compliance with the more stringent particulate emission limit for Boiler (Emission Points ID(s) 011, 012, & 013 listed in 5.1.8. [45CSR§2-4.1.b] (011, 012, 013)

- 5.1.4. No person shall cause, suffer, allow or permit the discharge of sulfur dioxide into the open air from all stacks located at one plant, measured in terms of pounds per hour, in excess of the amount determined as follows:

**Table 5.1.4.: Fuel Burning Unit 45CSR10 SO<sub>2</sub> Limits**

Emission Unit	SO <sub>2</sub> Emission Limit (lb/hr)
011	67.2
012	67.2
013	67.2

Compliance with 45CSR§10-3.3.f. shall be demonstrated through compliance with the more stringent particulate emission limit for Boiler (Emission Points ID(s) 011, 012, & 013) listed in 5.1.8. [45CSR§10-3.3.f.] (011, 012, 013)

- 5.1.5. Maximum emissions to the atmosphere from Emission Point ID# 007 (6.987 MMBtu/hr Bryan Steam Corporation Boiler) shall not exceed the following limits:

**Table 5.1.5.: Boiler 007 Emission Limits**

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	0.59	2.58
NO <sub>x</sub>	0.70	3.07
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.10	0.30
SO <sub>2</sub>	0.10	0.10
VOCs	0.10	0.20

(1) Including Condensables

- 5.1.6. Maximum emissions to the atmosphere from Emission Point ID# 008 (6.987 MMBtu/hr Bryan Steam Corporation Boiler) shall not exceed the following limits:

**Table 5.1.6.: Boiler 008 Emission Limits**

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	0.59	2.58
NO <sub>x</sub>	0.70	3.07
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.10	0.30
SO <sub>2</sub>	0.10	0.10
VOCs	0.10	0.20

(1) Including Condensables

- 5.1.7. Maximum emissions to the atmosphere from Emission Point ID# 010 (7 MMBtu/hr Bryan Steam Corporation Boiler) shall not exceed the following limits:

**Table 5.1.7.: Boiler 010 Emission Limits**

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	0.59	2.58
NO <sub>x</sub>	0.70	3.07
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.10	0.30
SO <sub>2</sub>	0.10	0.10
VOCs	0.10	0.20

(1) Including Condensables

- 5.1.8. Maximum emissions to the atmosphere from Emission Point ID# 016 (6 MMBtu/hr Bryan Steam Corporation Boiler) shall not exceed the following limits:

**Table 5.1.8.: Boiler 24524 Emission Limits**

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	1.16	5.10
NO <sub>x</sub>	0.59	2.58
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.06	0.24
SO <sub>2</sub>	0.004	0.015
VOCs	0.06	0.26

(1) Including Condensables

- 5.1.9. Each of the three (3) 21.0 MMBtu/hr Bryan Steam Corporation boilers (Emission Points ID(s) # 011, 012 & 013) shall not exceed the following emission rates:

**Table 5.1.9.: Boiler 2343-2345 Emission Limits**

Pollutant	Maximum Hourly Emissions per Boiler (lb/hr)	Maximum Annual Emissions per Boiler (tpy)
CO	4.07	17.84
NO <sub>x</sub>	2.06	9.02
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.20	0.86
SO <sub>2</sub>	0.02	0.05
VOCs	0.21	0.92

(1) Including Condensables

- 5.1.10. The maximum amount of natural gas to be burned by a single boiler (Emission Points ID(s)# 016) shall not exceed 6,000 cubic feet/hour or 52,600,000 cubic feet/year.
- 5.1.11. The maximum amount of natural gas to be burned by a single boiler (Emission Points ID(s)# 007, 008, 010) shall not exceed 7,000 cubic feet/hour or 61,320,000 cubic feet/year.
- 5.1.12. The three (3) Bryan Steam Corporation boilers (Emission Points ID(s) #-011,-012 & 013) shall combust only natural gas fuel. The maximum amount of natural gas consumed by each boiler shall not exceed 20,590 cubic feet per hour (cfh) and 180.4 million cubic feet per year (mmcfy).

## 5.2. Monitoring Requirements

- 5.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with the opacity standards of 45CSR2-3.1. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A. (007, 008, 010, 011, 012, 013 & 016)
- 5.2.2. The facility shall monitor the amount of natural gas used on a monthly and yearly basis for Boilers (Emission point ID(s): 007, 008, 010, 011, 012, 013 & 016).

5.2.3. The facility shall monitor the hours of operation on a monthly and yearly basis of the Boilers (Emission point ID(s): 007, 008, 010, 011, 012, 013 & 016).

**5.3. Testing Requirements**

N/A - See Section 3.3 Facility - Wide Testing Requirements

**5.4. Recordkeeping Requirements**

5.4.1. To demonstrate compliance with the emission limits and natural gas usage limits for the boilers, the permittee shall record for each boiler, the monthly hours of operation and the monthly fuel consumption. (007, 008, 010, 011, 012, 013, 016)

5.4.2. A record of each visible emission check shall be maintained on site for five (5) years from the record creation date. Such record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what actions(s), if any, was/were taken, and the name of the observer. (007, 008, 010, 011, 012, 013, 016)

**5.5. Reporting Requirements**

N/A - See Section 3.5 Facility - Wide Reporting Requirements

**6.0. Source-Specific Requirements [Fluid Beds - Emission point ID(s): 533, 534, 535, 536, 537, 538, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582 & 583]**

**6.1. Limitations and Standards**

6.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. [45CSR§7-3.1]

6.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified as follows:

**Table 6.1.2.: Fluid Bed 45CSR7 Individual Emission Limit**

<b>Emission Unit</b>	<b>PM Emission Limit (lb/hr)</b>
<u>Size 60</u> 534, 536, 538, 572, 574, 575, 577, 581	0.46
<u>Size 300</u> 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, 583	1.06

Compliance with 45CSR§7-4.1 shall be demonstrated through compliance with the more stringent particulate emission limit set forth in 6.1.3. [45CSR§7-4.1.]

- 6.1.3. Maximum particulate matter emissions ( $PM_{2.5}/PM_{10}/PM$ ) to the atmosphere from each Fluid Bed shall not exceed 0.1 lb/hr and 0.1 tons/year.
- 6.1.4. Maximum hourly volatile organic compound emissions to the atmosphere from the Fluid Beds shall not exceed:
  - a. 529.2 lb/hr for each fluid bed (except Emission Point ID 583) if not venting exhaust to the RTO or absorber for the purpose of controlling VOC emissions;
  - b. 10.59 lb/hr (as emitted from the RTO) each for Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580) if venting exhaust to the RTO for the purpose of controlling VOC emissions; and
  - c. 26.46 lb/hr (as emitted from the absorber) each for Fluid Bed (Emission point ID(s): 573 and 579) if venting exhaust to the absorber for the purpose of controlling VOC emissions.
- 6.1.5. Maximum total combined annual volatile organic compound emissions to the atmosphere from the Fluid Beds shall not exceed 74.0 tons/year.
- 6.1.6. The fluid beds shall operate according to the following requirements:
  - a. The aggregate dry material loading of the fluid bed (excluding times of tablet/beads coating in a fluid bed) shall not exceed the following limits:
    - (1) Fluid Beds (Emission point ID(s): 534, 536, 538, 572, 574, 575, 577, 581): 250 kg/load
    - (2) Fluid Beds (Emission point ID(s): 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, 583): 575 kg/load
  - b. The annual aggregate dry material loading of all fluid beds shall not exceed 99,000,000 pounds on a rolling yearly total basis;
  - c. Cartridge collectors shall be used at all times on each fluid bed to control particulate matter emissions. Each collector shall, at a minimum, achieve a collection efficiency of 95%;
  - d. The spray rate used in each fluid bed shall not exceed 4 kilograms-VOC/minute;
  - e. Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580) shall have the capability of directing exhaust to the RTO for control of VOCs or emitting directly to atmosphere;
  - f. Fluid Beds (Emission point ID(s): 573 and 579) shall have the capability of directing exhaust to the absorber for control of VOCs or emitting directly to atmosphere; and
  - g. No HAP-containing solvents shall be processed in any fluid bed.

## 6.2. Monitoring Requirements

- 6.2.1. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

- 6.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 6.1.6(c), the permittee shall:
- a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacturer's recommendations concerning control device maintenance and performance;
  - b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and
  - c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.
- 6.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 6.1.6(a), the permittee shall monitor and record the total dry material per load for each fluid bed. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each fluid bed is equal or less than the maximum load given under 6.1.6(a) or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 6.1.6(a).
- 6.2.4. For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 6.1.6(b), the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material into the fluid beds.
- 6.2.5. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 6.1.5, the permittee shall:
- a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds (Emission point ID(s): 534, 538, and 572 – 580).
  - b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Fluid Beds (Emission point ID(s): 534, 538, and 572 – 580) when each bed is and is not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.
  - c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all fluid beds by summing the following:
    - (1) The total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds (Emission point ID(s): 534, 538, and 572 – 580).
    - (2) The total amount of VOCs in pounds used in Fluid Beds (Emission point ID(s): 534, 538, and 572 – 580) when not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.

- (3) The total amount of VOCs used in Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 9.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580) when venting exhaust to the RTO for the purpose of controlling VOCs.
- (4) The total amount of VOCs used in Fluid Beds (Emission point ID(s): 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs. Based on compliance with Requirement 11.1.2 of this permit, the permittee may apply a VOC destruction efficiency of 95% to the amount of VOCs used in Fluid Beds (Emission point ID(s): 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs.

**6.3. Testing Requirements**

N/A - See Section 3.3 Facility - Wide Testing Requirements

**6.4. Recordkeeping Requirements**

- 6.4.1. Records of weekly inspections conducted on the cartridge collector shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
- 6.4.2. The permittee shall maintain a record of all solvents used in the fluid beds and keep a copy of the associated MSDS/SDS to verify that the solvents did not contain any constituent HAPs.

**6.5. Reporting Requirements**

N/A - See Section 3.5 Facility - Wide Reporting Requirements

**7.0. Source-Specific Requirements [Production Rooms]**

**7.1. Limitations and Standards**

- 7.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. **[45CSR§7-3.1]**
- 7.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified for each of the following emission points:

**Table 7.1.2.: Production Room Emission Points 45CSR7 Emission Limits**

<b>Emission Point</b>	<b>PM Emission Limit (lb/hr)</b>
287, 288, 291, 294, & 295	1.20 <sup>(1)</sup>
282, 296-300, 305-322	2.12 <sup>(2)</sup>
323	1.16 <sup>(3)</sup>
<u>324</u>	<u>1.11<sup>(4)</sup></u>

(1) Based on a PWR of 1,000 lb/hr for a Type “a” source operation.

- (2) Based on a PWR of 1,764 lb/hr for a Type "a" source operation.
- (3) Based on a PWR of 964 lb/hr for a Type "a" source operation.
- (4) Based on a PWR of 919 lb/hr for a Type "a" source operation.

Compliance with 45CSR§7-4.1 shall be demonstrated through compliance with the more stringent particulate emission limit set forth in 7.1.3 and 7.1.6. **[45CSR§7-4.1.]**

- 7.1.3. Maximum particulate matter emissions to the atmosphere shall not exceed the following:

**Table 7.1.3.: Rotoclone Emission Limits**

Source	Maximum Hourly Emissions (lb/hr)
Rotoclone (294)	0.4
Rotoclone (295)	0.4
Rotoclone (287)	0.4
Rotoclone (288)	0.4
Rotoclone (291)	0.4

- 7.1.4. The Rotoclone control devices and cartridge collector servicing production rooms shall be designed to achieve a collection efficiency of 98% for particulate matter emissions.
- 7.1.5. At all times the production rooms listed under Table 1.0 are in operation, exhaust from these shall be vented to the applicable control devices as listed under Table 1.0.
- 7.1.6. Maximum particulate matter (PM) emissions to the atmosphere from Emission Points 282, 296-300, and 305-324~~3~~, as emitted through the applicable control devices listed under Table 1.0, shall not exceed a maximum hourly emission rate of 0.90 pounds per hour (lb/hr) and 2.19 tons per year (tpy).
- 7.1.7. The permittee shall maintain and operate low water supply pressure sensors with control panel alarms for each Rotoclone to ensure adequate water supply and flow rate to the Rotoclones at each emission point specified, in order to ensure proper operation of the Rotoclone.

## 7.2. Monitoring Requirements

- 7.2.1. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

- 7.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 7.1.4., the permittee shall:
- a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacture's recommendations concerning control device maintenance and performance;
  - b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and
  - c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 98%.

**7.3. Testing Requirements**

N/A - See Section 3.3 Facility - Wide Testing Requirements

**7.4. Recordkeeping Requirements**

- 7.4.1. A record of each visible emission check shall be maintained on site for five (5) years from the record creation date. Such record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer
- 7.4.2. Records of Rotoclone low water supply pressure sensor alarm shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each Rotoclone low water supply pressure sensor alarm.

**7.5. Reporting Requirements**

N/A - See Section 3.5 Facility - Wide Reporting Requirements

**8.0. Source-Specific Requirements [Coating Pans - Emission point ID(s): 215, 241, 242, 244, 245, 246, 247]**

**8.1. Limitations and Standards**

- 8.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. [45CSR§7-3.1]
- 8.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified as follows:

**Table 8.1.2.: Coating Pans 45CSR7 Emission Limits**

Emission Unit	PM Emission Limit (lb/hr)
---------------	------------------------------

215	0.90
241	0.90
242	0.29
244	0.90
245	0.90
246	0.90
<u>247</u>	<u>0.90</u>

Compliance with 45CSR§7-4.1 shall be demonstrated through compliance with the more stringent particulate emission limit set forth in 8.1.3. **[45CSR§7-4.1.]**

- 8.1.3. Particulate matter emissions from the Coating Pans, venting through a cartridge collector ((Emission point ID(s): 215, 241, 242, 244, 245, and 246~~246~~ and 247)) at Emission Point ID Numbers 215, 241, 242, 244, 245, ~~and 246~~ and 247 shall not exceed the following:

**Table 8.1.3.: Coating Pans PM<sub>2.5</sub>/PM<sub>10</sub>/PM Emission Limits**

Emission Unit	PM <sub>2.5</sub> /PM <sub>10</sub> /PM Emission Limit	
	Pound/hour	ton/year
215	0.84	6.25
241	0.84	
242	0.28	
244	0.84	
245	0.84	
246	0.84	
<u>247</u>	<u>0.84</u>	

- 8.1.4. Maximum hourly volatile organic compound emissions to the atmosphere from the Coating Pans shall not exceed:
- a. 396.9 lb/hr for each coating pan unit if not venting exhaust to the RTO for the purpose of controlling VOC emissions.
  - b. 7.94 lb/hr (as emitted from the RTO) each for Coating Pans 244, 245, and 246 if venting exhaust to the RTO for the purpose of controlling VOC emissions.
- 8.1.5. Maximum total combined annual volatile organic compound emissions to the atmosphere from the Coating Pans shall not exceed 5.0 tons/year.
- 8.1.6. The coating pans shall operate according to the following requirements:
- a. The aggregate dry material loading of each coating pan shall not exceed the following values:
    - (1) Coating Pan (Emission point ID 215): 750 pound/load;
    - (2) Coating Pan (Emission point ID 241): 750 pound/load;
    - (3) Coating Pan (Emission point ID 242): 245 pound/load;
    - (4) Coating Pan (Emission point ID 244): 750 pound/load;

- (5) Coating Pan (Emission point ID 245): 750 pound/load; ~~and~~  
(6) Coating Pan (Emission point ID 246): 750 pound/load. ~~and~~  
~~(6)(7)~~ Coating Pan (Emission point ID 247): 750 pound/load.
- b. The annual aggregate dry material loading of all coating pans shall not exceed 11,000,000 pounds on a rolling yearly total basis;
  - c. Cartridge collectors shall be used at all times on each coating pan to control particulate matter emissions. Each collector shall, at a minimum, achieve a collection efficiency of 95%;
  - d. The solvent spray rate processed in coating pans (Emission point ID(s): 241, 242, 244, 245, and 246) shall not exceed 3,000 grams-VOC/minute in each coating pan;
  - e. No VOC-containing solvents shall be processed in coating pan 215;
  - f. Coating Pans (Emission point ID(s): 244, 245, and 246) shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere; and
  - g. No HAP-containing solvents shall be processed in any coating pan.

## 8.2. Monitoring Requirements

- 8.2.1. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR , Appendix A, Method 22 during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

- 8.2.2 For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 8.1.6(c), the permittee shall
- d. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacturer's recommendations concerning control device maintenance and performance;
  - e. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and
  - f. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.

- 8.2.3 For the purposes of demonstrating compliance with maximum dry material loading set forth in 8.1.6(a), the permittee shall monitor and record the total dry material per load for each coating pan. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each coating pan is equal or less than the maximum load given under 8.1.6(a) or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 6.1.6(a).
- 8.2.4 For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 8.1.6(b), the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material loaded into the coating pans.
- 8.2.5 For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 8.1.5, the permittee shall:
- a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in \_\_\_\_\_pounds used in each coating pan with the exception of Coating Pans (Emission point ID(s): 244, 245, and 246).
  - b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Coating Pans (Emission point ID(s): 244, 245, and 246) when each coating pan is and is not venting exhaust to the RTO for the purpose of controlling VOCs.
  - c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all coating pans by summing the following:
    - (1) The total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans (Emission point ID(s): 244, 245, and 246).
    - (2) The total amount of VOCs in pounds used in Coating Pans (Emission point ID(s): 244, 245, and 246) when not venting exhaust to the RTO for the purpose of controlling VOCs.
    - (3) The total amount of VOCs used in Coating Pans (Emission point ID(s): 244, 245, and 246) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 9.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Coating Pans (Emission point ID(s): 244, 245, and 246) when venting exhaust to the RTO for the purpose of controlling VOCs.

### 8.3. Testing Requirements

N/A - See Section 3.3 Facility - Wide Testing Requirements

### 8.4. Recordkeeping Requirements

- 8.4.1. Records of weekly inspections conducted on the cartridge collector shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
- 8.4.2. The permittee shall maintain a record of all solvents used in the coating pans and keep a copy of the associated MSDS/SDS to verify that the solvents did not contain any constituent HAPs.

### 8.5. Reporting Requirements

N/A - See Section 3.5 Facility - Wide Reporting Requirements

## 9.0. Source-Specific Requirements [Regenerative Thermal Oxidizer (RTO)]

**9.1. Limitations and Standards**

- 9.1.1. The permittee shall not cause, suffer, allow or permit particulate matter to be discharged from the RTO into the open air in excess of the quantity determined by use of the following formula:

$$\text{Emissions (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)}$$

Where, the factor, F, is as indicated in Table I below:

**Table I:** Factor, F, for Determining Maximum Allowable Particulate Emissions

<u>Incinerator Capacity</u>	<u>Factor F</u>
A. Less than 15,000 lbs/hr	5.43
B. 15,000 lbs/hr or greater	2.72

**[45CSR§6-4.1]**

- 9.1.2. The permittee shall not cause or allow emission of smoke into the atmosphere from the RTO which is twenty percent (20%) opacity or greater. The provisions of 45CSR§6-4.3 shall not apply to smoke which is less than forty percent (40%) opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six (6) minutes in any sixty (60)-minute period for stoking operations.

**[45CSR§6-4.3 and 4.4]**

- 9.1.3. Maximum emissions to the atmosphere from the RTO shall not exceed the values given in the following table:

**Table 9.1.3(a): RTO Emission Limits**

<b>Pollutant</b>	<b>Maximum Hourly Emissions (lb/hr)</b>	<b>Maximum Annual Emissions (tpy)</b>
CO	28.76	10.44
NO <sub>x</sub>	49.11	14.90
PM	2.68	0.96
PM <sub>10</sub>	2.68	0.96
PM <sub>2.5</sub>	2.68	0.96
SO <sub>2</sub>	0.08	0.05
VOCs	61.49	6.59

- 9.1.4. The RTO shall be operated according to the following requirements:
- The aggregate MDHI of the natural gas burner(s) shall not exceed 16.00 mmBtu/hr;
  - The aggregate annual amount of natural gas consumed by the RTO(s) shall not exceed 140.16 million cubic feet per rolling twelve month total; and
  - The aggregate maximum amount of solvent combusted by the RTO(s) shall not exceed 3,070 lb/hour or 1,019,240 pounds per rolling twelve month period.

- 9.1.5. The RTO shall, at all times when Fluid Beds ([Emission point ID\(s\): 534, 538, 572, 574 – 578; and 580](#)); Coating Pans ([Emission point ID\(s\): 244, 245; and 246](#)); Oven Dryers ([Emission point](#)

ID(s): 260, 261; and 264); and the Coating Line are venting exhaust to the RTO for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 98%.

- 9.1.6. The permittee shall, within 60 days of the date of the performance test required under 9.3.2, determine the optimal operating ranges of the RTO parameters listed under 9.1.6(a) and (b) so as to monitor the effective operation of the RTO. The determination of operating ranges shall be based on data obtained from performance testing, manufacturing recommendations, or operational experience. The permittee shall maintain on-site, and update as necessary, a certified report listing the operating ranges. Any changes to the operating ranges shall be accompanied by the date of the change and reason for the change.
  - a. Minimum RTO Combustion Chamber Temperature; and
  - b. RTO Exhaust Flow Rate.
- 9.1.7. The permittee shall, to the extent reasonably possible, operate the RTO within the operating ranges as established under 9.1.6 at all times Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission point ID(s): 244, 245, and 246); Oven Dryers (Emission point ID(s): 260, 261, and 264); and the Coating Line are venting exhaust to the RTO for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 9.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 6.2.5(c)(3), a VOC destruction efficiency of 98% may not be assumed for the duration of the venting of VOC from Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission point ID(s): -244, 245, and 246); Oven Dryers (Emission point ID(s): -260, 261, and 264); and the Coating Line.
- 9.1.8. The permittee shall conduct, at a minimum, an annual inspection of the RTO to ensure proper operation of the control device. The inspection shall include the burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork.

## 9.2. Monitoring Requirements

- 9.2.1. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

- 9.2.2. For the purposes of demonstrating compliance with maximum annual natural gas combustion rates set forth in 9.1.4(b), the permittee shall monitor and record the rolling twelve month total of natural gas combusted by the RTO.
- 9.2.3. For the purposes of demonstrating compliance with maximum solvent combustion rates set forth in 9.1.4(c), the permittee shall monitor and record the amount of solvent, in pounds, sent to the RTO from Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580); Coating Pans

(Emission point ID(s): 244, 245, and 246); Oven Dryers (Emission point ID(s): 260, 261, and 264); and the Coating Line. The monthly and rolling twelve month total of solvent sent to RTO from Fluid Beds (Emission point ID(s): 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission point ID(s): 244, 245, and 246); Oven Dryers (Emission point ID(s): 260, 261, and 264); and the Coating Line shall be summed and recorded.

- 9.2.4. For the purposes of demonstrating compliance with the requirements set forth in 9.1.5, the permittee shall continuously monitor and record the RTO Combustion Chamber Temperature (as measured at the outlet of the combustion chamber) and the RTO Exhaust Flow Rate (as measured at the RTO outlet or based on fan instrumentation). Monitoring shall be effected by use of the following:
- a. RTO Combustion Chamber Temperature: Thermocouples, RTDs, or alternative methods/instrumentation as appropriate for gas stream; and
  - b. RTO Exhaust Flow Rate: Differential pressure flow device, fan motor ammeter, or other type of device that measures gas velocity or flow rate.
- 9.2.5. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all manufacture's recommendations.

### 9.3. Testing Requirements

- 9.3.1. Within 60 days after achieving the maximum solvent combustion rate at which the RTO(s) are permitted to operated at, but not later than 180 days after initial startup, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the RTO(s) to determine compliance with the CO and NO<sub>x</sub> emission limits listed in Table 9.1.3. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.
- 9.3.2. Within 60 days after achieving the maximum solvent combustion rate at which the RTO is permitted to operated at, but not later than 180 days after the initial use of the RTO to control of VOCs during a Fluid Bed production run, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the RTO to determine compliance with the minimum VOC destruction efficiency as given under 9.1.5. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.

### 9.4. Recordkeeping Requirements

- 9.4.1. The permittee shall record the date, duration, and any corrective action taken in the occurrence of an excursion of RTO operating parameters outside the ranges as established under 9.1.6. If corrective action was not successful in a timely fashion, the permittee shall record the amount of solvent sent to the RTO while the excursion occurred.
- 9.4.2. The permittee shall meet all record-keeping requirements as applicable to the RTO and given under section 3.4 and 4.2 of this permit.

### 9.5 Reporting Requirements

N/A - See Section 3.5 Facility - Wide Reporting Requirements

## 10.0. Source-Specific Requirements [Oven Dryers -- Emission point ID(s): 260, 261, 264]

## 10.1. Limitations and Standards

- 10.1.1. Maximum hourly volatile organic compound emissions to the atmosphere from Oven Dryers (Emission point ID(s): 260, 261, and 264) shall not exceed:
- 529.2 lb/hr for each Oven Dryer if not venting exhaust to the RTO for the purpose of controlling VOC emissions; and
  - 10.59 lb/hr (as emitted from the RTO) for each Oven Dryer if venting exhaust to the RTO for the purpose of controlling VOC emissions.
- 10.1.2. The maximum total combined annual volatile organic compound emissions to the atmosphere from Oven Dryers (Emission point ID(s): 260, 261, and 264) shall not exceed 5.0 tons/year.
- 10.1.3. Oven Dryers (Emission point ID(s): 260, 261, and 264) shall operate according to the following requirements:
- Each Oven Dryer shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere; and
  - No HAP-containing solvents shall be processed in any Oven Dryer.

## 10.2. Monitoring Requirements

- 10.2.1. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 10.1.2., the permittee shall:
- Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Oven Dryers (Emission point ID(s): 260, 261, and 264) when each Oven Dryer is and is not venting exhaust to the RTO for the purpose of controlling VOCs; and
  - Calculate and record the monthly and rolling twelve month aggregate VOC emissions from Oven Dryers (Emission point ID(s): 260, 261, and 264) by summing the following:
    - The total amount of VOCs in pounds used in Oven Dryers (Emission point ID(s): 260, 261, and 264) when not —venting exhaust to the RTO for the purpose of controlling VOCs; and
    - The total amount of VOCs used in Oven Dryers (Emission point ID(s): 260, 261, and 264)-when venting exhaust —to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 9.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Oven Dryers (Emission point ID(s): 260, 261, and 264) when venting exhaust to the RTO for the purpose of controlling VOCs.

## 10.3. Testing Requirements

N/A - See Section 3.3 Facility - Wide Testing Requirements

## 10.4. Recordkeeping Requirements

- 10.4.1. The permittee shall maintain a record of all solvents used in Oven Dryers 260, 261, and 264 and keep a copy of the associated MSDS to verify that the solvents did not contain any constituent HAPs.

## 10.5. Reporting Requirements

N/A - See Section 3.5 Facility - Wide Reporting Requirements

## **11.0. Source-Specific Requirements [Absorber]**

### **11.1. Limitations and Standards**

- 11.1.1. The absorber shall, at all times when Fluid Beds 573 and 579 are venting exhaust to the absorber for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 95%.
- 11.1.2. The permittee shall, within 60 days of the date of the performance test required under 11.3.1, determine the optimal operating ranges of the absorber parameters listed under 11.1.2(a) so as to monitor the effective operation of the Absorber. The determination of operating ranges shall be based on data obtained from performance testing, manufacturing recommendations, or operational experience. The permittee shall maintain on-site, and update as necessary, a certified report listing the operating ranges. Any changes to the operating ranges shall be accompanied by the date of the change and reason for the change.
  - a. Minimum Water Flow
- 11.1.3. The permittee shall maintain and operate low water flow rate sensors with control panel alarms for the absorber to ensure adequate water flow rate to the absorber in order to ensure proper operation of the absorber.
- 11.1.4. The permittee shall, to the extent reasonably possible, operate the absorber within the operating ranges as established under 11.1.2. at all times Fluid Beds (Emission point ID(s): 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 11.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 6.2.5(c), a VOC destruction efficiency of 95% may not be assumed for the duration of the venting of VOC from Fluid Beds (Emission point ID(s): 573 and 579).
- 11.1.5. The permittee shall conduct, at a minimum, an annual inspection of the absorber to ensure proper operation of the control device. The inspection shall include the spray nozzles, fans, dampers, absorber shell, packing, and ductwork.

### **11.2. Monitoring Requirements**

- 11.2.1. For the purposes of demonstrating compliance with the requirements set forth in 11.1.2., the permittee shall continuously monitor and record the absorber water flow rate
- 11.2.2. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all manufacture's recommendations.

### **11.3. Testing Requirements**

- 11.3.1. Within 60 days after achieving the maximum solvent exhaust rate at which the absorber is permitted to operate at, but not later than 180 days after the initial use of the absorber to control of VOCs during a Fluid Bed production run, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the absorber to determine compliance with the minimum VOC removal efficiency as given under 11.1.4. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.

### **11.4. Recordkeeping Requirements**

- 11.4.1. The permittee shall record the date, duration, and any corrective action taken in the occurrence of an excursion of absorber operating parameters outside the ranges as established under 11.1.2. If corrective action was not successful in a timely fashion, the permittee shall record the amount of solvent sent to the absorber while the excursion occurred.
- 11.4.2. The permittee shall maintain records of Absorber low water flow rate alarms on site for five (5) years from the record creation date. The records shall state the date and time of each Absorber low water flow rate alarm and any corrective action taken.
- 11.4.3. The permittee shall meet all record-keeping requirements as applicable to the Absorber and given under section 3.4 and 4.2 of this permit.

## **11.5. Reporting Requirements**

N/A - See Section 3.5 Facility - Wide Reporting Requirements

## **12.0. Source-Specific Requirements [Coating Line]**

### **12.1. Limitations and Standards**

- 12.1.1. Maximum hourly VOC/HAP emissions to the atmosphere from the Coating Line shall not exceed:
  - a. 7.0 lb/hr for the Coating Line if not venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions; and
  - b. 0.14 lb/hr (as emitted from the RTO) for the Coating Line if venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions.
- 12.1.2. The maximum annual VOC/HAP emissions to the atmosphere from Coating Line shall not exceed 3.0 tons/year.
- 12.1.3. The Coating Line shall have the capability of directing exhaust to RTO for control of VOC/HAPs or emitting directly to atmosphere.

### **12.2. Monitoring Requirements**

- 12.2.1. For the purposes of demonstrating compliance with maximum annual VOC/HAP emission limit set forth in 10.1.2., the permittee shall:
  - a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOC/HAPs in pounds used in the Coating Line when it is and is not venting exhaust to the RTO for the purpose of controlling VOC/HAPs; and
  - b. Calculate and record the monthly and rolling twelve month aggregate VOC/HAPs emissions from the Coating Line by summing the following:
    - (1) The total amount of VOC/HAPs in pounds used in the Coating Line when not venting exhaust to the RTO for the purpose of controlling VOCs; and
    - (3) The total amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 9.1.7 of this permit, the permittee may apply a VOC/HAPs destruction efficiency of 98% to the amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOC/HAPs.

**12.3. Testing Requirements**

N/A - See Section 3.3 Facility - Wide Testing Requirements

**12.4. Recordkeeping Requirements**

12.4.1. The permittee shall maintain a record of all solvents used in the Coating Line and keep a copy of the associated MSDS/SDS.

**12.5. Reporting Requirements**

N/A - See Section 3.5 Facility - Wide Reporting Requirements

### CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title \_\_\_\_\_  
(please print or type) Name Title

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Appendix 2**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

*West Virginia Department of Environmental Protection  
Division of Air Quality*

*Jim Justice  
Governor*

*Austin Caperton  
Cabinet Secretary*

# Permit to Operate



*Pursuant to  
Title V  
of the Clean Air Act*

*Issued to:*  
Mylan Pharmaceuticals, Inc.  
Morgantown  
R30-06100033-2017 MM01

---

*William F. Durham  
Director*

*Issued: Draft/Proposed • Effective: [Equals issue date plus two weeks]  
Expiration: [5 years after issuance date] • Renewal Application Due: [6 months prior to expiration]*

---

Permit Number: **R30-06100033-2017**  
Permittee: **Mylan Pharmaceuticals, Inc.**  
Facility Name: **Morgantown**  
Mailing Address: **781 Chestnut Ridge Road, Morgantown, WV 26505**

---

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 C Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

---

Facility Location:	Morgantown, Monongalia County, West Virginia
Mailing Address:	PO Box 4310, Morgantown, WV 26504-4310
Telephone Number:	(304) 599-2595
Type of Business Entity:	Corporation
Facility Description:	Pharmaceutical Compounding and Formulating
SIC Codes:	2834
UTM Coordinates:	589.6 km Easting § 4390.1 km Northing § Zone 17

Permit Writer: Rex Compston, P.E.

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [ §§ 22B-1-1 et seq. ], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

---

*Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.*

---

**Table of Contents**

**1.0. Emission Units and Active R13, R14, and R19 Permits..... 3**

**2.0. General Conditions..... 9**

**3.0. Facility-Wide Requirements and Permit Shield .....18**

**Source-specific Requirements**

**4.0. Boilers.....26**

**5.0. Fluid Bed Granulators .....29**

**6.0. Production Rooms .....33**

**7.0. Coating Pans .....36**

**8.0. Regenerative Thermal Oxidizer (RTO).....40**

**9.0. Emergency Generators .....44**

**10.0. Oven Dryers .....46**

**11.0. Absorber.....48**

**12.0. Coating Line.....50**

**Attachment A: Class II General Permit G60-C**

## 1.0 Emission Units and Active R13, R14, and R19 Permits

### 1.1 Emission Units

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/Modified
001	None	001	Boiler 3: Natural gas boiler	6.27 MMBtu/hr	1987
002	None	002	Boiler 4: Natural gas boiler	1.5 MMBtu/hr	1987
003	None	003	Boiler 5: Natural gas boiler	6.00 MMBtu/hr	1991
004	None	004	Boiler 2: Natural gas boiler	1.18 MMBtu/hr	1974
006	None	006	Boiler 1: Natural gas boiler	3.34 MMBtu/hr	1968
007	None	007	Boiler 7: Natural gas boiler	6.99 MMBtu/hr	1997
008	None	008	Boiler 8: Natural gas boiler	6.99 MMBtu/hr	1997
009	None	009	Boiler 11: Natural gas boiler	2.07 MMBtu/hr	2000
009	None	009A	Boiler 12: Natural gas boiler	2.07 MMBtu/hr	2000
010	None	010	Boiler 15: Natural gas boiler	7 MMBtu/hr	2004
011	None	011	Boiler 2343: Natural gas boiler	21.0 MMBtu/hr	2005
012	None	012	Boiler 2344: Natural gas boiler	21.0 MMBtu/hr	2005
013	None	013	Boiler 2345: Natural gas boiler	21.0 MMBtu/hr	2005
014	None	014	Boiler 2674: Natural gas boiler	0.65 MMBtu/hr	2005
015	None	015	Boiler 2675: Natural gas boiler	0.65 MMBtu/hr	2005
016	None	016	Boiler 24524: Natural gas boiler	6.0 MMBtu/hr	2016
210	210	210	Coating Pan 169: Coating pan controlled by cartridge collector EF169	500 lb/load	1985
215	CC EF1390*	215	Coating Pan 1390	750 lb/load	1999
220	220	220	Coating Pan 186: Coating pan controlled by cartridge collector EF186	500 lb/load	1986
230	230	230	Coating Pan 217: Coating pan controlled by cartridge collector EF217	500 lb/load	1987
240	240	240	Coating Pan 99: Coating pan controlled by cartridge collector EF99	500 lb/load	1983
241	CC EF 4553*	241	Coating Pan 4549	750 lb/load	2009
242	CC EF4101*	242	Coating Pan 4027	245 lb/load	2008
243	243	243	Coating Pan 3853: Coating Pan controlled by cartridge collector 4164	750 lbs/load	2008
244; 10008085 <sup>(2)</sup>	CC 10024526; RTO*	244	Coating Pan 7552	750 lb/load	2010
245; 10008085 <sup>(2)</sup>	CC 10024525; RTO*	245	Coating Pan 8421	750 lb/load	2010

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/ Modified
246 10008085 <sup>(2)</sup>	CC 23583; RTO*	246	Coating Pan 23581	750 lbs/load	2015
<u>247</u>	<u>CC TBD;</u>	<u>247</u>	<u>Coating Pan TBD</u>	<u>750 lbs/load</u>	<u>2017</u>
260; 10008085 <sup>(2)</sup>	RTO*	260	Oven 19	Varies	Prior to 1973
261; 10008085 <sup>(2)</sup>	RTO*	261	Oven 18	Varies	Prior to 1973
264; 10008085 <sup>(2)</sup>	RTO*	264	Oven 0021	Electric, Load Varies	2013
1911; 10008085 <sup>(2)</sup>	RTO*	1911	Coating Line 1911	10.77 lb/hr	2014
280	Rotoclone 4	Rooms 74-101 – 74-122, 74-129	Room General Exhaust	Varies	1992
281	Rotoclone 3	Rooms 74-151, 74-153, 91-129, 91-130, 91-132, 91-134 – 91-137, 91-139, 91-229, 91-230, 91-232, 91-329, 91-330, 91-332, 91-334 – 91-337	Room General Exhaust	Varies	1991
282	Rotoclone 3798*	Rooms 74-150, 74-152, 74-154, 74-159, 74-160, 74-161, 74-162, 74-212, 91-232, 91-233	Room General Exhaust	Varies	2013
283	Rotoclone 2	Rooms 74-205 – 74-209, 99-217 – 99-219	Room General Exhaust	Varies	1982
287	Rotoclone 6*	Rooms BL209, BL211, BL214, BL304, BL306, BL307, BL309- BL314, BL316, BL402 – BL404, BL406-BL414, BL416	Room General Exhaust	Varies	1996
288	Rotoclone 5*	Rooms BB101-BB103, BB106, BB108-BB111, BB113-BB118, BB201-BB203, BB206-BB208, BB210-BB217, BB303, BB312	Room General Exhaust	Varies	1996
291	Rotoclone 7*	Rooms 85-205A – 85-208A, 99-105, 99-114 – 99-122, 99-209, ORG201A – ORG204A	Room General Exhaust	Varies	1999
294	Rotoclone 9*	Rooms BB112, 85-106, 85-108, 85-114, 85-115, 85-102, 85-104, 85-107, 85-110	Room General Exhaust	Varies	2003
295	Rotoclone 10*	Rooms BL218, BL219	Room General Exhaust	Varies	2004
296	Rotoclone 2317*	Rooms NEX140, NEX142, NEX144, NEX146, NEX159 - NEX162	Room General Exhaust	Varies	2005

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/Modified
297	Rotoclone 2318*	Rooms NEX139, NEX141, NEX143, NEX145, NEX152 - NEX158, NEX163, NEX164	Room General Exhaust	Varies	2005
298	Rotoclone 2319*	Rooms NEX131 - NEX136, NEX138, NEX147, NEX148	Room General Exhaust	Varies	2005
299	Rotoclone 2320*	Rooms NEX175, NEX177, NEX179, NEX181, NEX183	Room General Exhaust	Varies	2005
300	Rotoclone 2321*	Rooms NEX176, NEX178, NEX180, NEX182, NEX186 - NEX189	Room General Exhaust	Varies	2005
305	Rotoclone 2322*	Rooms NEX231, NEX232, NEX234, NEX275-NEX283, NEX286-NEX289	Room General Exhaust	Varies	2005
306	Rotoclone 2323*	Rooms NEX211A-217A	Room General Exhaust	Varies	2005
307	Rotoclone 2324*	Rooms NEX372, NEX374, NEX376, NEX378, NEX380	Room General Exhaust	Varies	2005
308	Rotoclone 2325*	Rooms NEX349, NEX362, NEX364, NEX366, NEX368, NEX369	Room General Exhaust	Varies	2005
309	Rotoclone 2326*	Rooms NEX346, NEX355, NEX357, NEX359 - NEX361	Room General Exhaust	Varies	2005
310	Rotoclone 2327*	Rooms NEX375, NEX377, NEX379, NEX381	Room General Exhaust	Varies	2005
311	Rotoclone 2328*	Rooms NEX 216A, NEX217A, NEX535-NEX538	Room General Exhaust	Varies	2005
312	Rotoclone 2329*	Rooms NEX321 - NEX330, NEX421 - NEX430	Room General Exhaust	Varies	2005
313	Rotoclone 2330*	Rooms NEX303, NEX405 - NEX412	Room General Exhaust	Varies	2005
314	Rotoclone 2331*	Rooms NEX468, NEX469, NEX472 - NEX480	Room General Exhaust	Varies	2005
315	Rotoclone 2332*	Rooms NEX435 - NEX438, NEX413 - NEX416, NEX419	Room General Exhaust	Varies	2005

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/ Modified
316	Rotoclone 2333*	Rooms NEX464 - NEX467, NEX481, NEX482, NEX484 - NEX492	Room General Exhaust	Varies	2005
317	Rotoclone 2334*	Rooms NEX305- NEX312, NEX316	Room General Exhaust	Varies	2005
318	Rotoclone 2335*	Rooms NEX445B, NEX445C, NEC445D, NEX445E, NEX445F, NEX445G	Room General Exhaust	Varies	2005
319	Rotoclone 2336*	Rooms NEX514, NEX516A-D, NEX522 -NEX524, NEX526, NEX528, NEX530, NEX535 - NEX538	Room General Exhaust	Varies	2005
320	Rotoclone 2337*	Rooms NEX503, NEX505, NEX507, NEX509, NEX511, NEX513	Room General Exhaust	Varies	2005
321	Rotoclone 2338*	Rooms NEX506, NEX508, NEX510, NEX512, NEX515	Room General Exhaust	Varies	2005
322	CC 17034*	Rooms 74-174, 74-175, 74-176, 74-177, 74-179, 74-179A, 74-180, 74-180A	Room General Exhaust	Varies	2012
<a href="#">323</a>	<a href="#">CC 10023125*</a>	<a href="#">Rooms 87-103 to 87-117</a>	<a href="#">Room General Exhaust</a>	<a href="#">Varies</a>	<a href="#">2014</a>
<a href="#">324</a>	<a href="#">CC TBD</a>	<a href="#">Rooms 74-101 to 74-110</a>	<a href="#">Room General Exhaust</a>	<a href="#">Varies</a>	<a href="#">2017</a>
533	CC 10024047	533	Fluid Bed 527	Up to 575 Kg/Load	1991
534; 10008085 <sup>(2)</sup>	CCEF473; RTO*	534	Fluid Bed 473	Up to 250 Kg/Load	1997
535	CC EF1339*	535	Fluid Bed 1339	Up to 575 Kg/Load	1997
536	CC EF1222*	536	Fluid Bed 1222	Up to 250 Kg/Load	1997
537	CC EF1552*	537	Fluid Bed 1552	Up to 575 Kg/Load	1997
538; 10008085 <sup>(2)</sup>	CC EF1855; RTO*	538	Fluid Bed 1855	Up to 250 Kg/Load	2002
571	CC EF2113*	571	Fluid Bed 2113	Up to 575 Kg/Load	2004
572; 10008085 <sup>(2)</sup>	CC EF2181; RTO*	572	Fluid Bed 2181	Up to 250 Kg/Load	2004
573; 10008538 <sup>(2)</sup>	CC 3340*; Absorber	573	Fluid Bed 2811	Up to 575 Kg/Load	2006
574; 10008085 <sup>(2)</sup>	CC 3416; RTO*	574	Fluid Bed 3287	Up to 250 Kg/Load	2006

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/ Modified
575; 10008085 <sup>(2)</sup>	CC 3643; RTO*	575	Fluid Bed 3620	Up to 250 Kg/Load	2007
576; 10008085 <sup>(2)</sup>	CC 3407; RTO*	576	Fluid Bed 3426	Up to 575 Kg/Load	2007
577; 10008085 <sup>(2)</sup>	CC 3881; RTO*	577	Fluid Bed 3704	Up to 250 Kg/Load	2008
578; 10008085 <sup>(2)</sup>	CC 3879; RTO*	578	Fluid Bed 3705	Up to 575 Kg/Load	2008
579; 10008538 <sup>(2)</sup>	CC 4287*; Absorber	579	Fluid Bed 4001	Up to 575 Kg/Load	2008
580; 10008085 <sup>(2)</sup>	CC 10007482; RTO*	580	Fluid Bed 7560	Up to 575 Kg/Load	2010
581	CC 15982*	581	Fluid Bed 15982	Up to 250 Kg/Load	2011
582	CC 16117*	582	Fluid Bed 16117	Up to 575 Kg/Load	2011
583	CC 10024247*	583	Fluid Bed 24410	Up to 575 Kg/Load	2016
N/A	None	N/A	Class I or Class II CFC-containing Equipment Subject to 40 CFR Part 82 Subpart F	Varies	Varies
10008085	None	10008085	Regenerative Thermal Oxidation	16.0 mmBtu/hr 3,070 lbs/hr	2010
10008538	None	10008538	Absorber	Up to 4,000 cfm	2010
10007530	None	10007530	Kohler 100 REZG Natural Gas Fired Emergency Generator	162 bhp/1,800 rpm	2010
10008594	None	10008594	Kohler 100 REZG Natural Gas Fired Emergency Generator	162 bhp/1,800 rpm	2011
1053	None	1053	750 kW Detroit Diesel/MTU	1,006 bhp/1800 rpm	2011
1053	None	1053	Diesel Fuel Tank	2,100 Gallons	2011
<del>323</del>	<del>CC 10023125*</del>	<del>Rooms 87-103 to 87- 117</del>	<del>Room General Exhaust</del>	<del>Varies</del>	<del>2014</del>

\*Identifies pollution control equipment included in R13-2068S.

<sup>(1)</sup>CC = Cartridge Collector; WS = Wet Scrubber; RTO = Regenerative Thermal Oxidizer

<sup>(2)</sup>Noted Emissions Units/Sources are authorized to exhaust (after the Cartridge Collector) to the RTO/Absorber (as applicable) and to atmosphere

## 1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

<b>Permit Number</b>	<b>Date of Issuance</b>
R13-2068S	October 27, 2016
G60-C035A	December 28, 2011

## 2.0 General Conditions

### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NSPS</b>	New Source Performance Standards
<b>CBI</b>	Confidential Business Information	<b>PM</b>	Particulate Matter
<b>CEM</b>	Continuous Emission Monitor	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>CES</b>	Certified Emission Statement	<b>pph</b>	Pounds per Hour
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>ppm</b>	Parts per Million
<b>CO</b>	Carbon Monoxide	<b>PSD</b>	Prevention of Significant Deterioration
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>psi</b>	Pounds per Square Inch
<b>DAQ</b>	Division of Air Quality	<b>SIC</b>	Standard Industrial Classification
<b>DEP</b>	Department of Environmental Protection	<b>SIP</b>	State Implementation Plan
<b>FOIA</b>	Freedom of Information Act	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>HAP</b>	Hazardous Air Pollutant	<b>TAP</b>	Toxic Air Pollutant
<b>HON</b>	Hazardous Organic NESHAP	<b>TPY</b>	Tons per Year
<b>HP</b>	Horsepower	<b>TRS</b>	Total Reduced Sulfur
<b>lbs/hr or lb/hr</b>	Pounds per Hour	<b>TSP</b>	Total Suspended Particulate
<b>LDAR</b>	Leak Detection and Repair	<b>USEPA</b>	United States Environmental Protection Agency
<b>m</b>	Thousand	<b>UTM</b>	Universal Transverse Mercator
<b>MACT</b>	Maximum Achievable Control Technology	<b>VEE</b>	Visual Emissions Evaluation
<b>mm</b>	Million	<b>VOC</b>	Volatile Organic Compounds
<b>mmBtu/hr</b>	Million British Thermal Units per Hour		
<b>mmft<sup>3</sup>/hr or mmcf/hr</b>	Million Cubic Feet Burned per Hour		
<b>NA or N/A</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		
<b>NO<sub>x</sub></b>	Nitrogen Oxides		

### **2.3. Permit Expiration and Renewal**

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.  
**[45CSR§30-5.1.b.]**
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.  
**[45CSR§30-4.1.a.3.]**
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.  
**[45CSR§30-6.3.b.]**
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.  
**[45CSR§30-6.3.c.]**

### **2.4. Permit Actions**

- 2.4.1. 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.  
**[45CSR§30-5.1.f.3.]**

### **2.5. Reopening for Cause**

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
- a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA 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.

- d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

## **2.6. Administrative Permit Amendments**

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.

[45CSR§30-6.4.]

## **2.7. Minor Permit Modifications**

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.

[45CSR§30-6.5.a.]

## **2.8. Significant Permit Modification**

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.

[45CSR§30-6.5.b.]

## **2.9. Emissions Trading**

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.

[45CSR§30-5.1.h.]

## **2.10. Off-Permit Changes**

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
- b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield.

- d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.
- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

**[45CSR§30-5.8]**

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

**[45CSR§30-5.8.a.]**

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

**[45CSR§30-5.8.c.]**

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

## **2.12. Reasonably Anticipated Operating Scenarios**

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
- b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
- c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
  - a. 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
  - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

## **2.16. Need to Halt or Reduce Activity not a Defense**

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

## **2.17. Emergency**

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

**[45CSR§30-5.7.c.]**

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

**[45CSR§30-5.7.d.]**

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**[45CSR§30-5.7.e.]**

## **2.18. Federally-Enforceable Requirements**

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

**[45CSR§30-5.2.a.]**

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

## **2.19. Duty to Provide Information**

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary 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 Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

**[45CSR§30-5.1.f.5.]**

## **2.20. Duty to Supplement and Correct Information**

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

**[45CSR§30-4.2.]**

## **2.21. Permit Shield**

2.21.1. Compliance with the conditions of this 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 this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

**[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

**[45CSR§30-5.6.c.]**

## **2.22. Credible Evidence**

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

**[45CSR§30-5.3.e.3.B. and 45CSR38]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

**[45CSR§30-5.1.e.]**

## **2.24. Property Rights**

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

**[45CSR§30-5.1.f.4]**

## **2.25. Acid Deposition Control**

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

**[45CSR§30-5.1.a.2.]**

### 3.0 Facility-Wide Requirements

#### 3.1 Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

**[40 C.F.R. 82, Subpart F]**

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

**[40 C.F.R. 68]**

- 3.1.9. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

**[45CSR7-5.2.]**

- 3.1.10. Due to unavoidable malfunction of equipment, emissions exceeding limits set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.

**[45CSR§7-9.1.]**

- 3.1.11. Facility-wide emissions to the atmosphere of Hazardous Air Pollutants (HAPs) shall not exceed or equal 9.4 tons per year of any single HAP or 24.4 tons per year of any combination of HAPs. Yearly total HAPs will be determined using a 12-month rolling total.

**[45CSR13, Permit No. R13-2068 (Condition 3.1.7.)]**

- 3.1.12. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment, identified with an asterisk, in Section 1.1. and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

**[45CSR§13-5.11. and Permit No. R13-2068 (Condition 4.1.1.)]**

### **3.2. Monitoring Requirements**

- 3.2.1. The facility shall monitor on a monthly and yearly basis facility-wide HAP usage. Yearly HAP calculations shall be based on a 12-month rolling total.

**[45CSR13, Permit No. R13-2068 (Condition 3.2.1.)]**

### **3.3. Testing Requirements**

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may

at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  1. The permit or rule evaluated, with the citation number and language.
  2. The result of the test for each permit or rule condition.
  3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code §§ 22-5-4(a)(14-15) and 45CSR13]

### 3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
  - a. The date, place as defined in this permit and time of sampling or measurements;

- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

**[45CSR§30-5.1.c.2.A.; 45CSR13, Permit No. R13-2068 (Condition 4.2.1.)]**

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. 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. Where appropriate, records may be maintained in computerized form in lieu of the above records.

**[45CSR§30-5.1.c.2.B.]**

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

**[45CSR§30-5.1.c. State-Enforceable only.]**

- 3.4.4. **Fugitive Dust Control Systems.** The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. The permittee shall also inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of such inspections and of all scheduled and non-scheduled maintenance of such systems. These records shall be maintained on site for five (5) years from the record creation date, stating any maintenance or corrective actions taken as a result of the monthly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

**[45CSR§30-5.1.c.]**

- 3.4.5. To demonstrate compliance with the facility-wide HAP limits, the permittee shall maintain monthly and yearly records of facility-wide HAP usage. The facility shall prepare monthly facility-wide calculations of the amount of each individual HAP emitted and the amount of aggregated HAPs emitted. Yearly HAP calculations shall be based on a 12-month rolling total.

**[45CSR13, Permit No. R13-2068 (Condition 3.4.3.)]**

- 3.4.6. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment identified with an asterisk in Section 1.1., the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

**[45CSR13, Permit No. R13-2068 (Condition 4.2.2.)]**

- 3.4.7. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment identified with an asterisk in Section 1.1., the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded.

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, Permit No. R13-2068 (Condition 4.2.3.)]

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.  
[45CSR§§30-4.4. and 5.1.c.3.D.]
- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.  
[45CSR§30-5.1.c.3.E.]
- 3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

#### **If to the DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

#### **If to the US EPA:**

Associate Director  
Office of Air Enforcement and Compliance  
Assistance (3AP20)  
U. S. Environmental Protection Agency  
Region III

1650 Arch Street  
Philadelphia, PA 19103-2029  
Phone: 304/926-0475  
FAX: 304/926-0478

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.  
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: [R3\\_APD\\_Permits@epa.gov](mailto:R3_APD_Permits@epa.gov). The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.  
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.  
[45CSR§30-5.1.c.3.A.]
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.
- 3.5.8. **Deviations.**
- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
  2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
  3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

**[45CSR§30-5.1.c.3.C.]**

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

**[45CSR§30-5.1.c.3.B.]**

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

**[45CSR§30-4.3.h.1.B.]**

### **3.6. Compliance Plan**

- 3.6.1. N/A

### **3.7. Permit Shield**

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

- a. 45CSR27 – *To Prevent and Control the Emissions of Toxic Air Pollutants*. This rule does not apply to the facility because the facility currently does not have the potential to emit any such air pollutant in quantities equal to or greater than those set forth in this rule.
- b. 40 C.F.R. 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984*. This subpart does not apply to the storage tanks at the facility because the tanks do not contain a petroleum liquid and the tanks have a capacity (8,200 gallons each) less than those tanks defined as an affected facility.
- c. 40 C.F.R. 60, Subpart Kb – *Standard of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*. There are no tanks at this facility that have a capacity of 75 cubic meters or greater, therefore, per 40 C.F.R. §60.110b(a), this subpart does not apply.
- d. 40 C.F.R. 63, Subpart F – *National Emissions Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry*. The facility does not manufacture any of the chemicals listed in Table I of Subpart F as a primary product.
- e. 40 C.F.R. 63, Subpart G – *National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater*. The facility is not subject to Subpart F, therefore, it is not subject to Subpart G of Part 63.

- f. 40 C.F.R. 63, Subpart FFFF – *National Standards for Miscellaneous Organic Chemical Manufacturing*. The facility does not emit hazardous air pollutants at major levels and is therefore not subject to this subpart.
- g. 40 C.F.R. 63, Subpart GGG – *National Standards for Pharmaceuticals Production*. The facility does not emit hazardous air pollutants at major levels and is therefore not subject to this subpart.
- h. 40 C.F.R. 63, Subpart DDDDD – *National Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters*. The facility is not a major source of hazardous air pollutants and is therefore not subject to this subpart.
- i. 40 C.F.R. 63, Subpart VVVVVV – *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources*. Mylan has stated that all HAP emissions are from the quality control laboratories, which are exempt from this subpart according to 40 C.F.R. § 63.11494(c)(4).
- j. 40 C.F.R. 64 - *Compliance Assurance Monitoring*. This is the third permit renewal for this facility. At the time of the second renewal, CAM was determined not to be applicable to the sources currently in use at the facility. Since the second renewal, several new pieces of equipment were installed at this facility. Any units installed since the second renewal either do not use control devices or, the pre-control device PTE of any unit being routed to a control device is less than major source thresholds, therefore CAM still does not apply.
- k. 45CSR§2-5.1 – The facility burns natural gas only; therefore this section of 45CSR2 does not apply.
- l. 45CSR§10-4 – The facility’s manufacturing process source operations do not emit sulfur dioxide with the exception of trace amounts from natural gas combustion.
- m. 45CSR§10-5 & 45CSR§10-8 – The facility’s boilers burn only natural gas; therefore, they are exempt from the requirements of these sections of 45CSR10.
- n. 45CSR10A – *Testing, Monitoring, Recordkeeping and Reporting Requirements Under 45CSR10*. The facility’s boilers combust natural gas only; therefore, the facility is exempt from the requirements of this rule.

**4.0 Boilers [emission point ID(s): 001, 002, 003, 004, 006, 007, 008, 009, 009A, 010, 011, 012, 013, 014, 015, 016]**

**4.1. Limitations and Standards**

4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six-minute block average.

**[45CSR§2-3.1 and 45CSR13, Permit No. R13-2068 (Condition 5.1.1.)]**

4.1.2. Compliance with the visible emission requirements of 45CSR2, subsection 3.1 (4.1.1.), shall be determined in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of 4.1.1. Continuous opacity monitors shall not be required on fuel burning units, which employ wet scrubbing systems for emission control.

**[45CSR§2-3.2 and 45CSR13, R13-2068 (Condition 5.1.2.)]**

4.1.3. The maximum amount of natural gas to be burned by a single boiler 7, 8, 15 (Emission Unit IDs 007, 008, 010) shall not exceed 7,000 ft<sup>3</sup>/hr or 61,320,000 ft<sup>3</sup>/yr.

**[45CSR13, Permit No. R13-2068 (Condition 5.1.11.)] (007, 008, 010)**

4.1.4. Maximum emissions from each boiler 7, 8, 15 (Emission Unit IDs 007, 008, 010) shall not exceed the following limits:

<b>Pollutant</b>	<b>Maximum Hourly Emissions (lb/hr)</b>	<b>Maximum Annual Emissions (tpy)</b>
Carbon Monoxide	0.59	2.58
Nitrogen Oxides	0.70	3.07
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.10	0.30
Sulfur Dioxide	0.10	0.10
Volatile Organic Compounds	0.10	0.20

(1) Including Condensables

**[45CSR13, Permit No. R13-2068 (Conditions 5.1.5., 5.1.6. and 5.1.7.)] (007, 008, 010)**

4.1.5. The three (3) Bryan Steam Corporation boilers 2343, 2344 & 2345 (Emission Unit IDs 011, 012, & 013) shall combust only natural gas fuel. The maximum amount of natural gas consumed by each boiler shall not exceed 20,590 ft<sup>3</sup>/hr and 180.4 million ft<sup>3</sup>/yr.

**[45CSR13, Permit No. R13-2068 (Condition 5.1.12.)] (011, 012, 013)**

- 4.1.6. Each of the three (3) 21.0 MMBtu/hr Bryan Steam Corporation boilers 2343, 2344, 2345 (Emission Unit IDs 011, 012, & 013) shall not exceed the following emission rates:

Pollutant	Maximum Hourly Emissions per Boiler (lb/hr)	Maximum Annual Emissions per Boiler (tpy)
Carbon Monoxide	4.07	17.84
Nitrogen Oxides	2.06	9.02
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.20*	0.86
Sulfur Dioxide	0.02**	0.05
Volatile Organic Compounds	0.21	0.92

(1) Including Condensables

\*Compliance with this streamlined limit will assure compliance with 45CSR§2-4.1.b. and R13-2068 (Condition 5.1.3.).

\*\*Compliance with this streamlined limit will assure compliance with 45CSR§10-3.3.f. and R13-2068 (Condition 5.1.4.).

**[45CSR§2-4.1.b., 45CSR§10-3.3.f., and 45CSR13, Permit No. R13-2068 (Conditions 5.1.3., 5.1.4., and 5.1.9.)] (011, 012, 013)**

- 4.1.7. Maximum emissions to the atmosphere from Emission Point ID# 016 (6 MMBtu/hr Bryan Steam Corporation Boiler) shall not exceed the following emission limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
Carbon Monoxide	1.16	5.10
Nitrogen Oxides	0.59	2.58
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.06	0.24
Sulfur Dioxide	0.004	0.015
Volatile Organic Compounds	0.06	0.26

(1) Including Condensables

**[45CSR13, Permit No. R13-2068 (Conditions 5.1.8.)] (016)**

- 4.1.8. The maximum amount of natural gas to be burned by a single boiler 24524 (Emission Point ID #016) shall not exceed 6,000 ft<sup>3</sup>/hr or 52,600,000 ft<sup>3</sup>/yr.

**[45CSR13, Permit No. R13-2068 (Condition 5.1.10.)] (016)**

## 4.2. Monitoring Requirements

- 4.2.1. The facility shall monitor the amount of natural gas used and the hours of operation for Boilers 7, 8, 15, 2343, 2344, 2345, and 24524 (Emission Unit IDs 007, 008, 010, 011, 012, 013, and 016) on a monthly and yearly basis. To demonstrate compliance with the emission limits and natural gas usage limits, the permittee shall record for each boiler the monthly hours of operation, and the monthly fuel consumption. **[45CSR16, 45CSR§2-8.3.c; 40 C.F.R. § 60.48c(g) (Subpart Dc); 45CSR13, Permit No. R13-2068 (Conditions 5.2.2., 5.2.3., and 5.4.1.)] (007, 008, 010, 011, 012, 013, and 016)**
- 4.2.2. At such reasonable times as the Director may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with the opacity standards of 45CSR§2-3.1. Method 9 shall be conducted in accordance with 40 C.F.R. 60, Appendix A.

**[45CSR13, Permit No. R13-2068 (Condition 5.2.1.)]**

**4.3. Testing Requirements**

4.3.1. Reserved.

**4.4. Recordkeeping Requirements**

4.4.1. A record of each visible emission check shall be maintained on site for five (5) years from the record creation date. Such record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

**[45CSR13, Permit No. R13-2068 (Condition 5.4.2.)]**

**4.5. Reporting Requirements**

4.5.1. See Section 3.5 Facility - Wide Reporting Requirements

**4.6. Compliance Plan**

4.6.1. None

**5.0 Fluid Bed Granulators [emission point ID(s): 533, 534, 535, 536, 537, 538, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, and 583]**

**5.1. Limitations and Standards**

5.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation, which is greater than twenty (20) percent opacity.  
**[45CSR§7-3.1 and 45CSR13, Permit No. R13-2068 (Condition 6.1.1.)]**

5.1.2. Maximum particulate matter emissions (PM<sub>2.5</sub>/PM<sub>10</sub>/PM) from each Fluid Bed to the atmosphere shall not exceed 0.1 pounds per hour and 0.1 tons per year.  
**[45CSR§7-4.1. and 45CSR13, Permit No. R13-2068 (Conditions 6.1.2. and 6.1.3.)]** *Compliance with this streamlined limit will assure compliance with 45CSR§7-4.1. and Permit No. R13-2068 (Condition 6.1.2.)*

5.1.3. The fluid beds shall operate according to the following requirements:

a. The aggregate dry material loading of the fluid bed (excluding times of tablet/beads coating in a fluid bed) shall not exceed the following limits:

(1) Fluid Beds 473, 1222, 1855, 2181, 3287, 3620, 3704, 15982 (Emission Unit IDs 534, 536, 538, 572, 574, 575, 577, 581): 250 kg/load

(2) Fluid Beds 527, 1339, 1552, 2113, 2811, 3426, 3705, 4001, 7560, 16117, 24410 (Emission Unit IDs 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, 583): 575 kg/load

b. The annual aggregate dry material loading of all fluid beds shall not exceed 99,000,000 pounds on a rolling yearly total basis.

c. Cartridge collectors shall be used at all times on each fluid bed to control particulate matter emissions. Each collector shall, at a minimum, achieve a collection efficiency of 95%.

d. The spray rate used in each fluid bed shall not exceed 4 kilograms-VOC/minute.

e. Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) shall have the capability of directing exhaust to the RTO for control of VOCs or emitting directly to atmosphere.

f. Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) shall have the capability of directing exhaust to the absorber for control of VOCs or emitting directly to atmosphere.

g. No HAP-containing solvents shall be processed in any fluid bed.

**[45CSR13, Permit No. R13-2068 (Condition 6.1.6.)]**

5.1.4. Maximum hourly VOC emissions to the atmosphere from the Fluid Beds shall not exceed:

a. 529.2 lb/hr for each fluid bed (Except Emission Point ID 583) if not venting exhaust to the RTO or absorber for the purpose of controlling VOC emissions.

- b. 10.59 lb/hr (as emitted from the RTO) each for Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) if venting exhaust to the RTO for the purpose of controlling VOC emissions.
- c. 26.46 lb/hr (as emitted from the absorber) each for Fluid Bed 2811 and 4001 (Emission Unit IDs 573 and 579) if venting exhaust to the absorber for the purpose of controlling VOC emissions.

**[45CSR13, Permit No. R13-2068 (Condition 6.1.4.)]**

- 5.1.5. Maximum total combined annual VOC emissions to the atmosphere from the Fluid Beds shall not exceed 74.0 tons/year.

**[45CSR13, Permit No. R13-2068 (Condition 6.1.5.)]**

## **5.2. Monitoring Requirements**

- 5.2.1. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 5.1.3.c, the permittee shall:
  - a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacturer's recommendations concerning control device maintenance and performance.
  - b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
  - c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.

**[45CSR13, Permit No. R13-2068 (Condition 6.2.2.)]**

- 5.2.2. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but not less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

**[45CSR13, Permit No. R13-2068 (Conditions 6.2.1.); 45CSR§30-5.1.c]**

- 5.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 5.1.3.a., the permittee shall monitor and record the total dry material per load for each fluid bed. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each fluid bed is equal or less than the maximum load given under 5.1.3.a. or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 5.1.3.a.  
**[45CSR13, Permit No. R13-2068 (Conditions 6.2.3.)]**
- 5.2.4. For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 5.1.3.b., the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material into the fluid beds.  
**[45CSR13, Permit No. R13-2068 (Conditions 6.2.4.)]**
- 5.2.5. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 5.1.5, the permittee shall:
- a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580).
  - b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580) when each bed is and is not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.
  - c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all fluid beds by summing the following:
    - (1) The total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580).
    - (2) The total amount of VOCs in pounds used in Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580) when not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.
    - (3) The total amount of VOCs used in Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) when venting exhaust to the RTO for the purpose of controlling VOCs.
    - (4) The total amount of VOCs used in Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs. Based on compliance with Requirement 11.1.2 of this permit, the permittee may apply a VOC destruction efficiency of 95% to the amount of VOCs used in Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs.

**[45CSR13, Permit No. R13-2068 (Conditions 6.2.5.)]**

### **5.3. Testing Requirements**

5.3.1. See Section 3.3.1.

#### **5.4. Recordkeeping Requirements**

5.4.1. The permittee shall maintain a record of all solvents used in the fluid beds and keep a copy of the associated MSDS/SDS to verify that the solvents did not contain any constituent HAPs.

**[45CSR13, Permit No. R13-2068 (Condition 6.4.2.)]**

5.4.2. Records of weekly inspections conducted on the cartridge collector shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.

**[45CSR13, Permit No. R13-2068 (Condition 6.4.1.)]**

#### **5.5. Reporting Requirements**

5.5.1. See Section 3.5 Facility - Wide Reporting Requirements

#### **5.6. Compliance Plan**

5.6.1. None

**6.0 Production Rooms [emission point ID(s): 280, 281, 282, 283, 287, 288, 291, 294, 295, 296, 297, 298, 299, 300, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324]**

**6.1. Limitations and Standards**

6.1.1. No person shall cause, suffer, allow or permit emission of smoke and /or particulate matter into the open air from any process source operation, which is greater than twenty (20) percent opacity.  
**[45CSR§7-3.1. and 45CSR13, Permit No. R13-2068 (Condition 7.1.1.)]** *(All units listed above)*

6.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified for each of the following emission points (under the appropriate source operation type in Table 45-7A found at the end of 45CSR7):

<b>Emission Point</b>	<b>PM Emission Limit (lb/hr)</b>
280, 281, 283	1.20 <sup>(1)</sup>
287, 288, 291, 294, & 295	1.20 <sup>(1)</sup>
282, 296-300, 305-322	2.12 <sup>(2)</sup>
323	1.16 <sup>(3)</sup>
<u>324</u>	<u>1.11<sup>(4)</sup></u>

<sup>(1)</sup> Based on a PWR of 1,000 lb/hr for a Type “a” source operation.

<sup>(2)</sup> Based on a PWR of 1,764 lb/hr for a Type “a” source operation.

<sup>(3)</sup> Based on a PWR of 964 lb/hr for a Type “a” source operation.

<sup>(4)</sup> Based on a PWR of 919 lb/hr for a Type “a” source operation.

Compliance with 45CSR§7-4.1 for emission points 287, 288, 291, 294, 295, 282, 296-300, and 305-324~~3~~ shall be demonstrated through compliance with the more stringent particulate emission limit set forth in 6.1.3 and 6.1.5.

**[45CSR§7-4.1. and Permit No. R13-2068 (Condition 7.1.2.)]**

6.1.3. Maximum particulate matter emissions to the atmosphere shall not exceed the following:

<b><u>Source</u></b>	<b><u>Maximum PM Hourly Emissions (lb/hr)</u></b>
Rotoclone (287)	0.4
Rotoclone (288)	0.4
Rotoclone (291)	0.4
Rotoclone (294)	0.4
Rotoclone (295)	0.4

**[45CSR§7-4.1. and Permit No. R13-2068 (Condition 7.1.3.)]** *Compliance with this streamlined limit will assure compliance with 45CSR§7-4.1. and Permit Number R13-2068 (Condition 7.1.2.)*

6.1.4. At all times the production rooms listed under Table 1.0 are in operation, exhaust from these shall be vented to the applicable control devices as listed under Table 1.0.

**[45CSR13, Permit No. R13-2068 (Condition 7.1.5.)]**

- 6.1.5. Maximum particulate matter (PM) emissions to the atmosphere from Emission Points 282, 296-300, and 305-324~~3~~, as emitted through the applicable control devices listed under Table 1.0, shall not exceed a maximum hourly emission rate of 0.90 pounds per hour (lb/hr) and 2.19 tons per year (tpy).  
**[45CSR§7-4.1. and 45CSR13, Permit No. R13-2068 (Condition 7.1.6.)]** *Compliance with this streamlined limit will assure compliance with 45CSR§7-4.1.and Permit R13-2068 (Condition 7.1.2.).*
- 6.1.6. The Rotoclone control devices and cartridge collector servicing production rooms shall be designed to achieve a collection efficiency of 98% for particulate matter emissions.  
**[45CSR13, Permit No. R13-2068 (Condition 7.1.4.)]**
- 6.1.7. The permittee shall maintain and operate low water supply pressure sensors with control panel alarms for each Rotoclone to ensure adequate water supply and flow rate to the Rotoclones at each emission point specified, in order to ensure proper operation of the Rotoclone.  
**[45CSR13, Permit No. R13-2068 (Condition 7.1.7.)]**

## 6.2. Monitoring Requirements

- 6.2.1. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but not less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

**[45CSR13, Permit No. R13-2068 (Conditions 7.2.1.); 45CSR§30-51.1.c]**

- 6.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 6.1.6, the permittee shall:
- Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacturer's recommendations concerning control device maintenance and performance;
  - Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and

- c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 98%.

**[45CSR13, Permit No. R13-2068 (Conditions 7.2.2)]**

### **6.3. Testing Requirements**

- 6.3.1. See Section 3.3.1.

### **6.4. Recordkeeping Requirements**

- 6.4.1. A record of each visible emission check shall be maintained on site for five (5) years from the record creation date. Such record shall include the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

**[45CSR13, Permit No. R13-2068 (Condition 7.4.1.)]**

- 6.4.2. Records of Rotoclone low water supply pressure sensor alarm shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each Rotoclone low water supply pressure sensor alarm.

**[45CSR13, Permit No. R13-2068 (Condition 7.4.2.)]**

### **6.5. Reporting Requirements**

- 6.5.1. See Section 3.5 Facility - Wide Reporting Requirements

### **6.6. Compliance Plan**

- 6.6.1. None

**7.0 Coating Pans [emission point ID(s): 210, 215, 220, 230, 240, 241, 242, 243, 244, 245, 246, 247]**

**7.1. Limitations and Standards**

7.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation, which is greater than twenty (20) percent opacity.  
**[45CSR§7-3.1. and 45CSR13, Permit No. R13-2068 Condition 8.1.1.)]**

7.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7. Based on the process weight rates for the Coating Pans (excluding Coating Pans 1390, 3853, 4549, 4027, 7552, 8421 ~~and 23581, 23581 and TBD~~; Emission Unit ID No. 215, 241, 242, 243, 244, 245, ~~and 246~~246 and 247), 333 pounds per hour each, the corresponding allowable particulate matter emission rate is 0.4 pounds per hour each. Based on the process weight rates for Coating Pan 3853 (Emission Unit ID 243), 750 pounds per hour, the corresponding allowable particulate matter emission rate is 0.9 pounds per hour.  
**[45CSR§7-4.1] (Coating Pans 169, 186, 217, 99, 3853; Emission Unit IDs 210, 220, 230, 240, 243)**

7.1.3. Particulate matter emissions from the Coating Pan, venting through a cartridge collector (Coating Pans 1390, 4549, 4027, 7552, 8421 ~~and 23581, 23581 and TBD~~; Emission Unit IDs 215, 241, 242, 244, 245, 246, 247) at Emission Point ID No. 215, 241, 242, 244, 245, ~~and 246~~246 and 247 shall not exceed the following:

Emission Unit	PM <sub>2.5</sub> /PM <sub>10</sub> /PM Emission Limit	
	Pounds per Hour	Tons per Year
215	0.84	6.25
241	0.84	
242	0.28	
244	0.84	
245	0.84	
246	0.84	
<u>247</u>	<u>0.84</u>	

**[45CSR§7-4.1 and 45CSR13, Permit No. R13-2068 (Conditions 8.1.2 and 8.1.3)] (215, 241, 242, 244, 245 ~~and 246, 246 and 247~~) Compliance with this streamlined limit will assure compliance with 45CSR§7-4.1 and R13-2068 (Condition 8.1.2.).**

7.1.4. Maximum hourly volatile organic compound emissions to the atmosphere from the Coating Pans shall not exceed:

- a. 396.9 lb/hr for each coating pan unit if not venting exhaust to the RTO for the purpose of controlling VOC emissions.
- b. 7.94 lb/hr (as emitted from the RTO) each for Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) if venting exhaust to the RTO for the purpose of controlling VOC emissions.

**[45CSR13, Permit No. R13-2068 (Condition 8.1.4.)]**

- 7.1.5. Maximum total combined annual volatile organic compound emissions to the atmosphere from the Coating Pans shall not exceed 5.0 tons/year.

**[45CSR13, Permit No. R13-2068 (Condition 8.1.5.)]**

- 7.1.6. The coating pans shall operate according to the following requirements:

- a. The aggregate dry material loading of each coating pan shall not exceed the following values:

- (1) Coating Pan 1390 (Emission Unit ID 215): 750 pound/load;
- (2) Coating Pan 4549 (Emission Unit ID 241): 750 pound/load;
- (3) Coating Pan 4027 (Emission Unit ID 242): 245 pound/load;
- (4) Coating Pan 7552 (Emission Unit ID 244): 750 pound/load;
- (5) Coating Pan 8421 (Emission Unit ID 245): 750 pound/load; ~~and~~
- (6) Coating Pan 23581 (Emission Unit ID 246): 750 pound/load; and
- ~~(7) Coating Pan (TBD) (Emission Unit ID 247): 750 pound/load.~~

- b. The annual aggregate dry material loading of all coating pans shall not exceed 11,000,000 pounds on a rolling yearly total basis.
- c. Cartridge collectors shall be used at all times on each coating pan to control particulate matter emissions. Each collector shall, at a minimum, achieve a collection efficiency of 95%.
- d. The solvent spray rate processed in coating pans 4549, 4027, 7552, 8421 and 23581 (Emission Unit IDs 241, 242, 244, 245 and 246) shall not exceed 3,000 grams-VOC/minute in each coating pan.
- e. No VOC-containing solvents shall be processed in coating pan 1390 (Emission Unit ID 215).
- f. Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere.
- g. No HAP-containing solvents shall be processed in any coating pan.

**[45CSR13, Permit No. R13-2068 (Condition 8.1.6.)]**

## 7.2. Monitoring Requirements

- 7.2.1. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but no less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

**[45CSR13, Permit No. R13-2068 (Condition 8.2.1.); 45CSR§30-5.1.c]**

- 7.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 7.1.6.c, the permittee shall:
- a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacture's recommendations concerning control device maintenance and performance.
  - b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
  - c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.

**[45CSR13, Permit No. R13-2068 (Condition 8.2.2.)]**

- 7.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 7.1.6.a., the permittee shall monitor and record the total dry material per load for each coating pan. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each coating pan is equal or less than the maximum load given under 7.1.6.a. or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 7.1.6.a.

**[45CSR13, Permit No. R13-2068 (Condition 8.2.3.)]**

- 7.2.4. For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 7.1.6.b., the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material loaded into the coating pans.

**[45CSR13, Permit No. R13-2068 (Condition 8.2.4.)]**

- 7.2.5. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 7.1.5, the permittee shall:

- a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246).
- b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) when each coating pan is and is not venting exhaust to the RTO for the purpose of controlling VOCs.
- c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all coating pans by summing the following:
  - (1) The total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246).
  - (2) The total amount of VOCs in pounds used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) when not venting exhaust to the RTO for the purpose of controlling VOCs.
  - (3) The total amount of VOCs used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244,

245 and 246) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) when venting exhaust to the RTO for the purpose of controlling VOCs.

**[45CSR13, Permit No. R13-2068 (Condition 8.2.5.)]**

### **7.3. Testing Requirements**

7.3.1. See Section 3.3.1.

### **7.4. Recordkeeping Requirements**

7.4.1. Records of weekly inspections conducted on the cartridge collector shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.

**[45CSR13, Permit No. R13-2068 (Condition 8.4.1.)]**

7.4.2. The permittee shall maintain a record of all solvents used in the coating pans and keep a copy of the associated MSDS/SDS to verify that the solvents did not contain any constituent HAPs.

**[45CSR13, Permit No. R13-2068 (Condition 8.4.2.)]**

### **7.5. Reporting Requirements**

7.5.1. See Section 3.5 Facility - Wide Reporting Requirements

### **7.6. Compliance Plan**

7.6.1. None

## 8.0 Regenerative Thermal Oxidizer (RTO) [emission point ID(s): 10008085]

### 8.1 Limitations and Standards

- 8.1.1. The permittee shall not cause, suffer, allow or permit particulate matter to be discharged from the RTO into the open air in excess of the quantity determined by use of the following formula:

$$\text{Emissions (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)}$$

Where, the factor, F, is as indicated below:

Incinerator Capacity	Factor F
A. Less than 15,000 lbs/hr	5.43
B. 15,000 lbs/hr or greater	2.72

The expected maximum loading of the RTO(s) is 1.54 tons/hour (3,070 lbs/hr). Using this value in the above equation produces a PM emission limit of 8.36 lb/hr for the RTO(s). However, the RTO(s) are limited to emit a maximum 2.68 lb/hr of particulate matter in Condition 8.1.3.

**[45CSR§6-4.1 and 45CSR13, Permit No. R13-2068 (Condition 9.1.1.)]**

- 8.1.2. The permittee shall not cause or allow emission of smoke into the atmosphere from the RTO which is twenty percent (20%) opacity or greater. The provisions of 45CSR§6-4.3 shall not apply to smoke which is less than forty percent (40%) opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six (6) minutes in any sixty (60)-minute period for stoking operations.

**[45CSR§6-4.3 and 4.4 and 45CSR13, Permit No. R13-2068 (Condition 9.1.2.)]**

- 8.1.3. Maximum emissions to the atmosphere from the RTO shall not exceed the values given in the following table:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	28.76	10.44
NO <sub>x</sub>	49.11	14.90
PM	2.68	0.96
PM <sub>10</sub>	2.68	0.96
PM <sub>2.5</sub>	2.68	0.96
SO <sub>2</sub>	0.08	0.05
VOCs	61.49	6.59

**[45CSR13, Permit No. R13-2068 (Condition 9.1.3.)]**

- 8.1.4. The RTO shall be operated according to the following requirements:
- The aggregate MDHI of the natural gas burner(s) shall not exceed 16.00 mmBtu/hr.
  - The aggregate annual amount of natural gas consumed by the RTO(s) shall not exceed 140.16 million cubic feet per rolling twelve month total.

- c. The aggregate maximum amount of solvent combusted by the RTO(s) shall not exceed 3,070 lb/hour or 1,019,240 pounds per rolling twelve month period.

**[45CSR13, Permit No. R13-2068 (Condition 9.1.4.)]**

- 8.1.5. The RTO shall, at all times when Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line are venting exhaust to the RTO for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 98%.

**[45CSR13, Permit No. R13-2068 (Condition 9.1.5.)]**

- 8.1.6. The permittee shall, within 60 days of the date of the performance test required under 8.3.2, determine the optimal operating ranges of the RTO parameters listed under 8.1.6(a) and (b) so as to monitor the effective operation of the RTO. The determination of operating ranges shall be based on data obtained from performance testing, manufacturing recommendations, or operational experience. The permittee shall maintain on-site, and update as necessary, a certified report listing the operating ranges. Any changes to the operating ranges shall be accompanied by the date of the change and reason for the change.

- a. Minimum RTO Combustion Chamber Temperature; and

- b. RTO Exhaust Flow Rate.

**[45CSR13, Permit No. R13-2068 (Condition 9.1.6.)]**

- 8.1.7. The permittee shall, to the extent reasonably possible, operate the RTO within the operating ranges as established under 8.1.6 at all times Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line are venting exhaust to the RTO for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 8.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 5.2.5(c)(3), a VOC destruction efficiency of 98% may not be assumed for the duration of the venting of VOC from Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line.

**[45CSR13, Permit No. R13-2068 (Condition 9.1.7.)]**

- 8.1.8. The permittee shall conduct, at a minimum, an annual inspection of the RTO to ensure proper operation of the control device. The inspection shall include the burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork.

**[45CSR13, Permit No. R13-2068 (Condition 9.1.8.)]**

## **8.2. Monitoring Requirements**

- 8.2.1. Visible emissions monitoring shall be conducted initially at least once per month for all emission points subject to opacity limitations. After three consecutive monthly readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring

shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but no less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.

**[45CSR13, Permit No. R13-2068 (Condition 9.2.1.); 45CSR§30-5.1.c.]**

- 8.2.2. For the purposes of demonstrating compliance with maximum annual natural gas combustion rates set forth in 8.1.4.b, the permittee shall monitor and record the rolling twelve month total of natural gas combusted by the RTO.

**[45CSR13, Permit No. R13-2068 (Condition 9.2.2.)]**

- 8.2.3. For the purposes of demonstrating compliance with maximum solvent combustion rates set forth in 8.1.4.c, the permittee shall monitor and record the amount of solvent, in pounds, sent to the RTO from Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line. The monthly and rolling twelve month total of solvent sent to RTO from Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line shall be summed and recorded.

**[45CSR13, Permit No. R13-2068 (Condition 9.2.3.)]**

- 8.2.4. For the purposes of demonstrating compliance with the requirements set forth in 8.1.5, the permittee shall continuously monitor and record the RTO Combustion Chamber Temperature (as measured at the outlet of the combustion chamber) and the RTO Exhaust Flow Rate (as measured at the RTO outlet or based on fan instrumentation). Monitoring shall be effected by use of the following:

- a. RTO Combustion Chamber Temperature: Thermocouples, RTDs, or alternative methods/instrumentation as appropriate for gas stream;
- b. RTO Exhaust Flow Rate: Differential pressure flow device, fan motor ammeter, or other type of device that measures gas velocity or flow rate.

**[45CSR13, Permit No. R13-2068 (Condition 9.2.4.)]**

- 8.2.5. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all manufacturer's recommendations.

**[45CSR13, Permit No. R13-2068 (Condition 9.2.5.)]**

### **8.3. Testing Requirements**

- 8.3.1. Within 60 days after achieving the maximum solvent combustion rate at which the RTO(s) are permitted to operate at, but not later than 180 days after initial startup, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the RTO(s) to determine compliance with the CO and NO<sub>x</sub> emission limits listed in 8.1.3. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.

**[45CSR13, Permit No. R13-2068 (Condition 9.3.1.)]**

- 8.3.2. Within 60 days after achieving the maximum solvent combustion rate at which the RTO is permitted to operate at, but not later than 180 days after the initial use of the RTO to control of VOCs during a Fluid Bed production run, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the RTO to determine compliance with the minimum VOC destruction efficiency as given under 8.1.5. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.  
**[45CSR13, Permit No. R13-2068 (Condition 9.3.2.)]**

#### **8.4. Recordkeeping Requirements**

- 8.4.1. The permittee shall record the date, duration, and any corrective action taken in the occurrence of an excursion of RTO operating parameters outside the ranges as established under 8.1.6. If corrective action was not successful in a timely fashion, the permittee shall record the amount of solvent sent to the RTO while the excursion occurred.  
**[45CSR13, Permit No. R13-2068 (Condition 9.4.1.)]**
- 8.4.2. The permittee shall meet all record-keeping requirements as applicable to the RTO and given under section 3.4 of this permit.  
**[45CSR13, Permit No. R13-2068 (Condition 9.4.2.)]**

#### **8.5. Reporting Requirements**

- 8.5.1. See Section 3.5 Facility - Wide Reporting Requirements

#### **8.6. Compliance Plan**

- 8.6.1. None

**9.0 Emergency Generators [emission point ID(s): 10007530, 1053, & 10008594]**

**9.1. Limitations and Standards**

9.1.1. Only pipeline quality natural gas shall be burned in Emergency Generators 10007530 and 10008594. **[45CSR13, General Permit Registration G60-C035]**

9.1.2. Maximum emissions to the atmosphere for Emergency Generators 10007530 and 10008594 shall not exceed the values given in the following table:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
<b>Emergency Generator 10007530</b>		
CO	1.43	0.36
NO <sub>x</sub>	0.71	0.18
VOCs	0.36	0.09
<b>Emergency Generator 10008594</b>		
CO	1.43	0.36
NO <sub>x</sub>	0.71	0.18
VOCs	0.36	0.09

**[45CSR13, General Permit Registration G60-C035]**

9.1.3. Maximum emissions to the atmosphere for Emergency Generator 1053 shall not exceed the values given in the following table:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	5.79	1.45
NO <sub>x</sub>	10.58	2.65
VOCs	10.58	2.65

**[45CSR13, General Permit Registration G60-C035]**

9.1.4. Emergency Generator 1053 shall not exceed a fuel oil sulfur content of 0.0015%. *Compliance with this limit will ensure compliance with the less stringent limit of 0.05% in General Permit Registration G60-C035.*

**[45CSR16; 45CSR13, General Permit Registration G60-C035, 40CFR§60.4207(b)]**

9.1.5. For Emergency Generators 10007530 and 10008594, the following conditions from G60-C apply: 1.0, 2.0, 3.0, 4.0, 5.0, 8.2.5, 8.2.9, 8.3.4, 8.3.8, 8.4.1, 8.4.2, 8.4.4, and 8.4.5.

For Emergency Generator 1053, the following conditions from G60-C apply: 1.0, 2.0, 3.0, 4.0, 5.0, 7.1.1, 7.1.2, 7.1.3, 7.1.4, 7.1.6, 7.1.9, 7.1.10, 7.1.11, 7.1.14, 7.1.17, 7.1.18, 7.1.19, 7.1.20, 7.1.21, 7.1.23, and 7.1.25.

**9.2. Monitoring Requirements**

9.2.1. Monitoring requirements shall be based on requirements set forth in Class II General Permit G60-C (Attachment A).

### **9.3. Testing Requirements**

- 9.3.1. Testing requirements shall be based on requirements set forth in Class II General Permit G60-C (Attachment A).

For Emergency Generators 10007530 and 10008594, the following conditions from G60-C apply: 8.4.6 and 8.5.1.

For Emergency Generator 1053, the following conditions from G60-C apply: 7.2.1, 7.2.2, 7.2.3, and 7.2.4.

### **9.4. Recordkeeping Requirements**

- 9.4.1. Recordkeeping requirements shall be based on requirements set forth in Class II General Permit G60-C (Attachment A).

For Emergency Generators 10007530 and 10008594, the following conditions from G60-C apply: 8.6.1.a and 8.6.1.b.

For Emergency Generator 1053, the following conditions from G60-C apply: 7.3.1, 7.3.2, 7.3.3, 7.3.4, 7.3.6, 7.3.7, and 7.3.8.

### **9.5. Reporting Requirements**

- 9.5.1. Reporting requirements shall be based on requirements set forth in Class II General Permit G60-C (Attachment A).

For Emergency Generators 10007530 and 10008594, the following condition from G60-C applies: 8.6.1.c

For Emergency Generator 1053, the following condition from G60-C applies: 7.3.5.

### **9.6. Compliance Plan**

- 9.6.1. None

## 10.0 Oven Dryers [emission point ID(s): 260, 261, 264]

### 10.1 Limitations and Standards

10.1.1. Maximum hourly volatile organic compound (VOC) emissions to the atmosphere from Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261 and 264) shall not exceed:

- a. 529.2 lb/hr for each Oven Dryer if not venting exhaust to the RTO for the purpose of controlling VOC emissions.
- b. 10.59 lb/hr (as emitted from the RTO) for each Oven Dryers if venting exhaust to the RTO for the purpose of controlling VOC emissions.

**[45CSR13, Permit No. R13-2068 (Condition 10.1.1.)]**

10.1.2. The maximum total combined annual volatile organic compound (VOC) emissions to the atmosphere from Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) shall not exceed 5.0 tons/year.

**[45CSR13, Permit No. R13-2068 (Condition 10.1.2.)]**

10.1.3. Oven Dryers 260, 261, and 264 shall operate according to the following requirements:

- a. Each Oven Dryers shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere; and
- b. No HAP-containing solvents shall be processed in any Oven Dryer.

**[45CSR13, Permit No. R13-2068 (Condition 10.1.3.)]**

### 10.2 Monitoring Requirements

10.2.1. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 10.1.2., the permittee shall:

- a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when each Oven Dryer is and is not venting exhaust to the RTO for the purpose of controlling VOCs; and
- b. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) by summing the following:
  - i. The total amount of VOCs in pounds used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when not venting exhaust to the RTO for the purpose of controlling VOCs; and
  - ii. The total amount of VOCs used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when venting exhaust to the RTO for the purpose of controlling VOCs.

**[45CSR13, Permit No. R13-2068 (Condition 10.2.1.)]**

### **10.3. Testing Requirements**

10.3.1. See Section 3.3.1.

### **10.4. Recordkeeping Requirements**

10.4.1. The permittee shall maintain a record of all solvents used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) and keep a copy of the associated MSDS to verify that the solvents did not contain any constituent HAPs.

**[45CSR13, Permit No. R13-2068 (Condition 10.4.1.)]**

### **10.5. Reporting Requirements**

10.5.1. See Section 3.5 Facility - Wide Reporting Requirements

### **10.6. Compliance Plan**

10.6.1. None

## **11.0 Absorber [emission point ID(s): 10008538]**

### **11.1. Limitations and Standards**

11.1.1. The absorber shall, at all times when Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 95%.

**[45CSR13, Permit No. R13-2068 (Condition 11.1.1.)]**

11.1.2. The permittee shall, within 60 days of the date of the performance test required under 11.3.1, determine the optimal operating ranges of the absorber parameters listed under 11.1.2(a) so as to monitor the effective operation of the Absorber. The determination of operating ranges shall be based on data obtained from performance testing, manufacturing recommendations, or operational experience. The permittee shall maintain on-site, and update as necessary, a certified report listing the operating ranges. Any changes to the operating ranges shall be accompanied by the date of the change and reason for the change.

a. Minimum Water Flow

**[45CSR13, Permit No. R13-2068 (Condition 11.1.2.)]**

11.1.3. The permittee shall maintain and operate low water flow rate sensors with control panel alarms for the absorber to ensure adequate water flow rate to the absorber in order to ensure proper operation of the absorber.

**[45CSR13, Permit No. R13-2068 (Condition 11.1.3.)]**

11.1.4. The permittee shall, to the extent reasonably possible, operate the absorber within the operating ranges as established under 11.1.2. at all times Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 11.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 5.2.5.c, a VOC destruction efficiency of 95% may not be assumed for the duration of the venting of VOC from Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579).

**[45CSR13, Permit No. R13-2068 (Condition 11.1.4.)]**

11.1.5. The permittee shall conduct, at a minimum, an annual inspection of the absorber to ensure proper operation of the control device. The inspection shall include the spray nozzles, fans, dampers, absorber shell, packing, and ductwork.

**[45CSR13, Permit No. R13-2068 (Condition 11.1.5.)]**

### **11.2. Monitoring Requirements**

11.2.1. For the purposes of demonstrating compliance with the requirements set forth in 11.1.2., the permittee shall continuously monitor and record the absorber water flow rate

**[45CSR13, Permit No. R13-2068 (Condition 11.2.1.)]**

11.2.2. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all manufacturer's recommendations.

**[45CSR13, Permit No. R13-2068 (Condition 11.2.2.)]**

### **11.3. Testing Requirements**

- 11.3.1. Within 60 days after achieving the maximum solvent exhaust rate at which the absorber is permitted to operate at, but not later than 180 days after the initial use of the absorber to control of VOCs during a Fluid Bed production run, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the absorber to determine compliance with the minimum VOC removal efficiency as given under 11.1.4. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.  
**[45CSR13, Permit No. R13-2068 (Condition 11.3.1.)]**

### **11.4. Recordkeeping Requirements**

- 11.4.1. The permittee shall record the date, duration, and any corrective action taken in the occurrence of an excursion of absorber operating parameters outside the ranges as established under 11.1.2. If corrective action was not successful in a timely fashion, the permittee shall record the amount of solvent sent to the absorber while the excursion occurred.  
**[45CSR13, Permit No. R13-2068 (Condition 11.4.1.)]**
- 11.4.2. The permittee shall maintain records of Absorber low water flow rate alarms on site for five (5) years from the record creation date. The records shall state the date and time of each Absorber low water flow rate alarm and any corrective action taken.  
**[45CSR13, Permit No. R13-2068 (Condition 11.4.2.)]**
- 11.4.3. The permittee shall meet all record-keeping requirements as applicable to the Absorber and given under section 3.4 of this permit.  
**[45CSR13, Permit No. R13-2068 (Condition 11.4.3.)]**

### **11.5. Reporting Requirements**

- 11.5.1. See Section 3.5 Facility - Wide Reporting Requirements

### **11.6. Compliance Plan**

- 11.6.1. None

## **12.0. Coating Line [emission point ID(s): 1911, 10008085]**

### **12.1. Limitations and Standards**

- 12.1.1. Maximum hourly VOC/HAP emissions to the atmosphere from the Coating Line shall not exceed:
- a. 7.0 lb/hr for the Coating Line if not venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions; and
  - b. 0.14 lb/hr (as emitted from the RTO) for the Coating Line if venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions.  
**[45CSR13, Permit No. R13-2068 (Condition 12.1.1.)]**
- 12.1.2. The maximum annual VOC/HAP emissions to the atmosphere from Coating Line shall not exceed 3.0 tons/year.  
**[45CSR13, Permit No. R13-2068 (Condition 12.1.2.)]**
- 12.1.3. The Coating Line shall have the capability of directing exhaust to RTO for control of VOC/HAPs or emitting directly to atmosphere.  
**[45CSR13, Permit No. R13-2068 (Condition 12.1.3.)]**

### **12.2. Monitoring Requirements**

- 12.2.1. For the purposes of demonstrating compliance with maximum annual VOC/HAP emission limit set forth in 10.1.2., the permittee shall:
- a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOC/HAPs in pounds used in the Coating Line when it is and is not venting exhaust to the RTO for the purpose of controlling VOC/HAPs; and
  - b. Calculate and record the monthly and rolling twelve month aggregate VOC/HAPs emissions from the Coating Line by summing the following:
    - (1) The total amount of VOC/HAPs in pounds used in the Coating Line when not venting exhaust to the RTO for the purpose of controlling VOCs; and
    - (2) The total amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC/HAPs destruction efficiency of 98% to the amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOC/HAPs.  
**[45CSR13, Permit No. R13-2068 (Condition 12.2.1.)]**

### **12.3. Testing Requirements**

- 12.3.1. See Section 3.3 Facility - Wide Testing Requirements

#### **12.4. Recordkeeping Requirements**

- 12.4.1. The permittee shall maintain a record of all solvents used in the Coating Line and keep a copy of the associated MSDS/SDS.  
**[45CSR13, Permit No. R13-2068 (Condition 12.4.1.)]**

#### **12.5. Reporting Requirements**

- 12.5.1. See Section 3.5 Facility - Wide Reporting Requirements

#### **12.6. Compliance Plan**

- 12.6.1. None

## **Attachment A: Class II General Permit G60-C**

APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION

**Appendix 3**

MYLAN PHARMACEUTICALS INC.  
PLANT ID# 061-00033  
MORGANTOWN, WEST VIRGINIA

## Appendix 3 – PSD Applicability Review

### R14 PSD Applicability Review

Mylan Pharmaceuticals Inc. (Mylan) is adding a new dust collector as part of this permit application. This equipment is being added to provide additional exhaust air for production rooms. The following table outlines increases in Particulate Matter emissions based on the past 5 years of permit applications:

Permit Name	Application Date	Increase in PM	Description of Changes
R13-2068O	June 2011	0 tons	<ul style="list-style-type: none"> <li>Modifications to RTO, Absorber, and Fluid Bed maximum load information.</li> </ul>
R13-2068P	July 2013	-0.31 tons	<ul style="list-style-type: none"> <li>The addition of a cartridge collector to control particulate matter emissions from production rooms,</li> <li>The replacement of an existing rotoclone with a new rotoclone,</li> <li>The addition of a pilot coating line for research and development,</li> <li>PM limit decrease for coating pans,</li> <li>VOC limit decrease for fluid beds, and</li> <li>The addition of a new oven dryer (replaces an existing oven dryer).</li> </ul>
R13-2068Q	July 2014	0.43 tons	<ul style="list-style-type: none"> <li>The addition of a cartridge collector to control particulate matter emissions from production room general exhaust. This replaces existing HEPA filter units inside the room.</li> </ul>
R13-2068R	September 2015	0 tons	<ul style="list-style-type: none"> <li>The addition of a coating pan and associated dust collector to the facility.</li> </ul>
R13-2068S	June 2016	0.33 tons	<ul style="list-style-type: none"> <li>The addition of a fluid bed and associated dust collector to the facility,</li> <li>The addition of a boiler, and</li> <li>The replacement of a similar cartridge type dust collector for a fluid bed.</li> <li>The replacement of similar cartridge type dust collectors for two coating pans.</li> </ul>
R13-2068T	February 2017	0.58 tons	<ul style="list-style-type: none"> <li>The addition of a cartridge collector to control particulate matter emissions from production room general exhaust</li> <li>The addition of a coating pan and associated dust collector to the facility.</li> </ul>

Based on a minor increase of particulate matter, this permit application would not be a significant emissions increase or a significant net emissions increase per 45CSR14; therefore, 45CSR14 would not be applicable to this permit application.