Mylan
Seeing is believing

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

September 28, 2015

Joe Kessler, PE
WV Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

RE: Mylan Pharmaceuticals Inc., Chestnut Ridge Manufacturing Facility
DAQ Plant ID# 061-00033
Application for NSR Permit (R13-2068R) and Title V Permit (R30-06100033-2012) Modifications

Dear Mr. Kessler:

Thank you for your time on September 23, 2015 to meet with Mylan EHS representatives and discuss the aforementioned Rule 13 application for modification. As requested during the meeting, Mylan hereby submits for your review and subsequent approval, revised pages to the "Modification Application for NSR Permit and Title V Permit Revision" that was submitted July 9, 2015 for the addition of a coating pan and associated dust collector to the facility. The modifications are being submitted to align the calculations for the new coating pan with previously permitted coating pans to maintain consistency within Mylan's Rule 13 and Title V permit.

Enclosed is the following revised information relating to said permit application modification:

- Attachment J – Emission Points Data Summary Sheet
- Attachment N – Supporting Emissions Calculations;
- Attachment S – Title V Permit Revision Information;
- Appendix 2 – Mylan Proposed Draft Permit Terms

Additionally, as discussed and agreed during the September 23 meeting, Mylan's coating pans are not regulated as a "Duplicate Source Operation" under 45CSR7 (Rule 7). Mylan's formulations and batch sizes are governed by the approvals of the United States Food and Drug Administration and other international health authorities. Additionally, the Morgantown facility manufactures hundreds of pharmaceutical products in batch operations. Based on these items, Mylan does not have the ability to utilize larger coating pans for processing larger batches in coating.

Therefore, maximum allowable emission rates from Table 45-7A should be applied to each coating pan as an individual source operation rather than as a duplicate source operation as currently reflected in Mylan's Title V permit emission limits.

Mylan has always strived to maintain a proactive role in assuring environmental compliance and appreciates your assistance with this permit application. Should you require any additional information, please contact Eric Hunsberger at the address provided by the letterhead, by telephoning (304) 554-7392 or by email at eric.hunsberger@mylan.com.

Sincerely,

Dale L. Stemple
Vice President, Global Environmental, Health and Safety

cc: Brian Tephabock, WV DEP
Mylan Inc., Global EHS
Eric Hunsberger
Joe Losko

Mylan
Seeing is believing

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

July 9, 2015

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

RE: Mylan Pharmaceuticals Inc., Chestnut Ridge Manufacturing Facility
DAQ Plant ID# 061-00033
Application for NSR Permit (R13-2068R) and Title V Permit (R30-06100033-2012) Modifications

Dear Sir or Madam:

Mylan Pharmaceuticals Inc. (Mylan) hereby submits for your review and subsequent approval, a "Modification Application for NSR Permit 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:

- The addition of a coating pan and associated dust collector to the facility.

Enclosed is the following information completing said permit application:

- Original "Permit Application";
- Three signed copies of the "Permit Application";
- The check for the $1000 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" will 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 with this permit application. Should you require any additional information, please contact me directly at the address provided by the letterhead or by telephoning (304) 554-5751.

Sincerely,

Justin Hartshorn

Justin Hartshorn
Senior Manager, North America Environmental Compliance

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

VENDOR NO.	VENDOR NAME	CHECK NUMBER	CHECK DATE
2001768	West Virginia Dept of Environmental	527097	06/25/2015

TRANSACTION NO.	DATE	INVOICE NO.	GROSS AMOUNT	DISC/WITHELD	NETAMOUNT
5200490473	06/18/2015	61815AIRPERMIT	1,000.00	0.00 / 0.00	1,000.00

On behalf of Mylan Pharmaceuticals Inc

TOTAL **********1,000.00

ORIGINAL CHECK IS PRINTED ON CHEMICAL REACTIVE PAPER WHICH CONTAINS A WATERMARK

Mylan®
Seeing is believing

MYLAN INC.
1000 MYLAN BOULEVARD
CANONSBURG, PA 15317-0000

62-20
311

CHECK NO.
527097
Citibank, N.A. One Penn's W
New Castle, DE 19720

CHECK DATE
06/25/2015

CHECK AMOUNT
**********1000.00

PAY *EXACTLY *** ONE THOUSAND USD ***

VOID AFTER 180 DAYS

TO THE ORDER OF

West Virginia Dept of Environmental
Protection-Division of Air Quality
601 57th Street
CHARLESTON WV 25304-2943

AUTHORIZED SIGNATURE

⑈527097⑈ ⑆031100209⑆ 38788171⑈

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(ORIGINAL DOCUMENT)

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

PREPARED BY:

Mylan Pharmaceuticals Inc.

TABLE OF CONTENTS

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Appendix 1

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

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
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:
☐ **OWNER** ☐ **OPERATOR** ☒ **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. **West Virginia Business Registration.** Is the applicant a resident of the State of West Virginia? ☒ **YES** ☐ **NO**
- If **YES,** provide a copy of the **Certificate of Incorporation/Organization/Limited Partnership** (one page) including any name change amendments or other Business Registration Certificate as **Attachment A.**
- If **NO,** provide a copy of the **Certificate of Authority/Authority of L.L.C./Registration** (one page) including any name change amendments or other Business Certificate as **Attachment A.**

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 *proposed site?* ☒ **YES** ☐ **NO**
- If **YES,** please explain: Applicant owns the site.
- If **NO,** you are not eligible for a permit for this source.

9. Type of plant or facility (stationary source) to be **constructed, modified, relocated, administratively updated** or **temporarily permitted** (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):
R13-2068Q, issued September 29, 2014
R30-06100033-2012 MM03, issued December 2, 2014

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):	12C. Nearest city or town:	12D. County:
N/A	Morgantown	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. The coating pan will tie into the existing regenerative thermal oxidizer at the site for control of solvent emissions.

14A. Provide the date of anticipated installation or change: Modification: 9/30/2015 – If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: / /	14B. Date of anticipated Start-Up if a permit is granted: 11/1/2015

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), 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:

☐ Bulk Liquid Transfer Operations	☐ Haul Road Emissions	☐ Quarry
☐ Chemical Processes	☐ Hot Mix Asphalt Plant	☐ Solid Materials Sizing, Handling and Storage Facilities
☐ Concrete Batch Plant	☐ Incinerator	☐ Storage Tanks
☐ Grey Iron and Steel Foundry	☐ Indirect Heat Exchanger	

☐ General Emission Unit, specify: Coating Pan

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

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

☐ Absorption Systems	☒ Baghouse (Cartridge collector)	☐ Flare
☐ Adsorption Systems	☐ Condenser	☐ Mechanical Collector
☐ Afterburner	☐ Electrostatic Precipitator	☐ 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:

☐ Authority of Corporation or Other Business Entity	☐ Authority of Partnership
☐ Authority of Governmental Agency	☐ 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 Scott C. I (Please use blue ink) DATE: 8 July 2015 (Please use blue ink)

35B. Printed name of signee: Scott Denicourt		35C. Title: General Manager and Vice President, Morgantown Operations
35D. E-mail: scott.denicourt@mylan.com	36E. Phone: 304-599-2595	36F. FAX: 304-598-5471
36A. Printed name of contact person (if different from above): Justin Hartshorn		36B. Title: Senior Manager, NA Environmental Compliance
36C. E-mail: justin.hartshorn@mylan.com	36D. Phone: 304-554-5751	36E. FAX: 304-598-5471

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

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

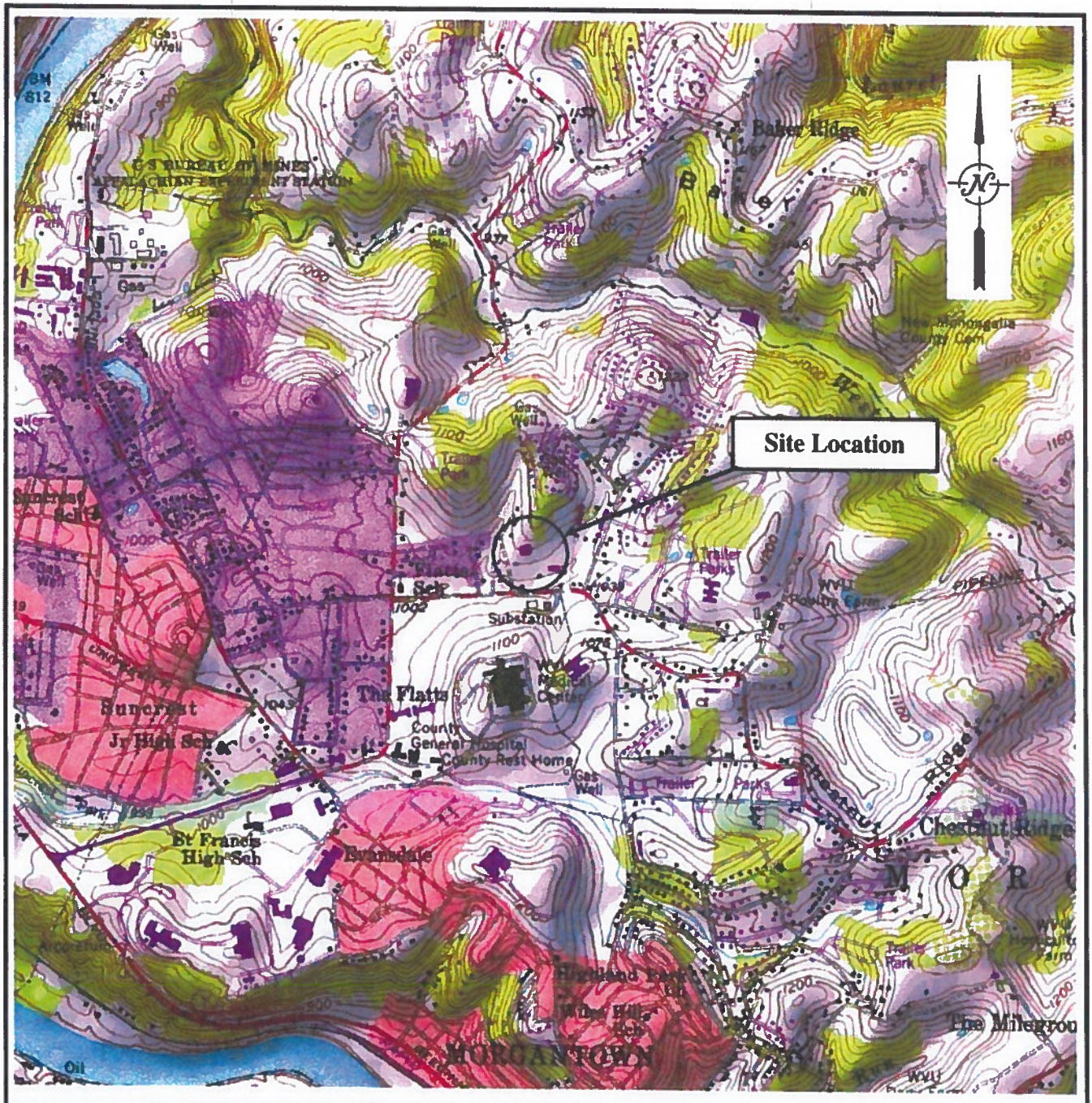
TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them. CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

atL006 v.1
L2137111296

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

Equipment	Proposed Installation Date	Proposed Start Up Date
New Coating Pan and associated dust collector	September 30, 2015	November 1, 2015

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.

Presumed Applicable Air Quality Requirements

Regulatory Citation	Emission Source Affected	Description of Applicability	Compliance Demonstration
45CSR7-3.1	Cartridge Collector: DC246	20% max. opacity from all PM-emitting vent points other than the boilers vent points.	Quarterly visual observation and recordkeeping of visual observations.
45CSR7-4.1	Cartridge Collector: DC246	PM emission limits from all PM-emitting vent points other than the boilers vent points.	Proper operation and maintenance of cartridge collectors.

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

Presumed Non-Applicable Air Quality Requirements

Regulatory Citation	Emission Sources Presumed to be Non-Applicable	Basis of Non-Applicability
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

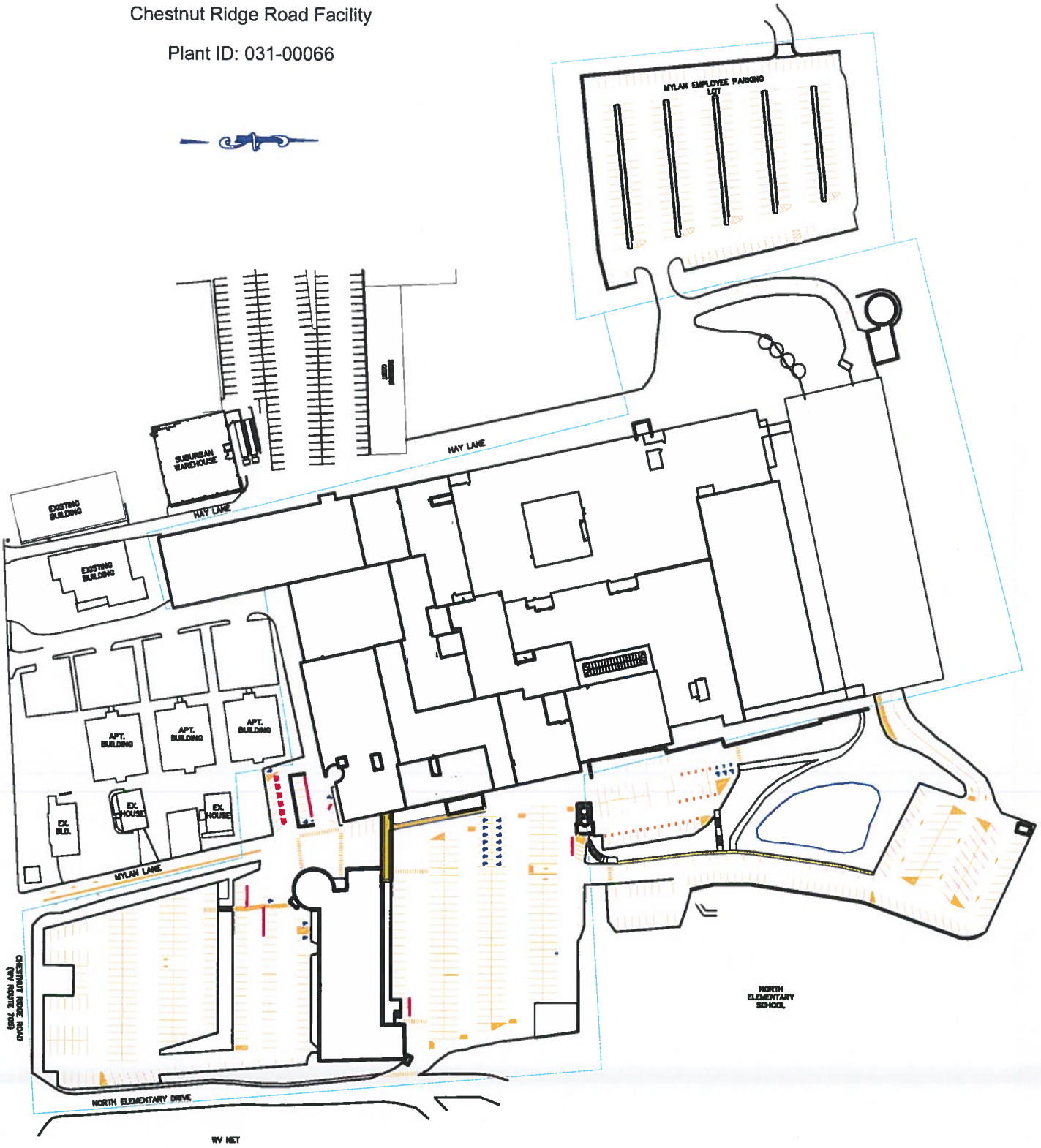
MYLAN PHARMACEUTICALS INC.
PLANT ID# 061-00033
MORGANTOWN, WEST VIRGINIA

Attachment E - Plot Plan

Mylan Pharmaceuticals Inc.

Chestnut Ridge Road Facility

Plant ID: 031-00066

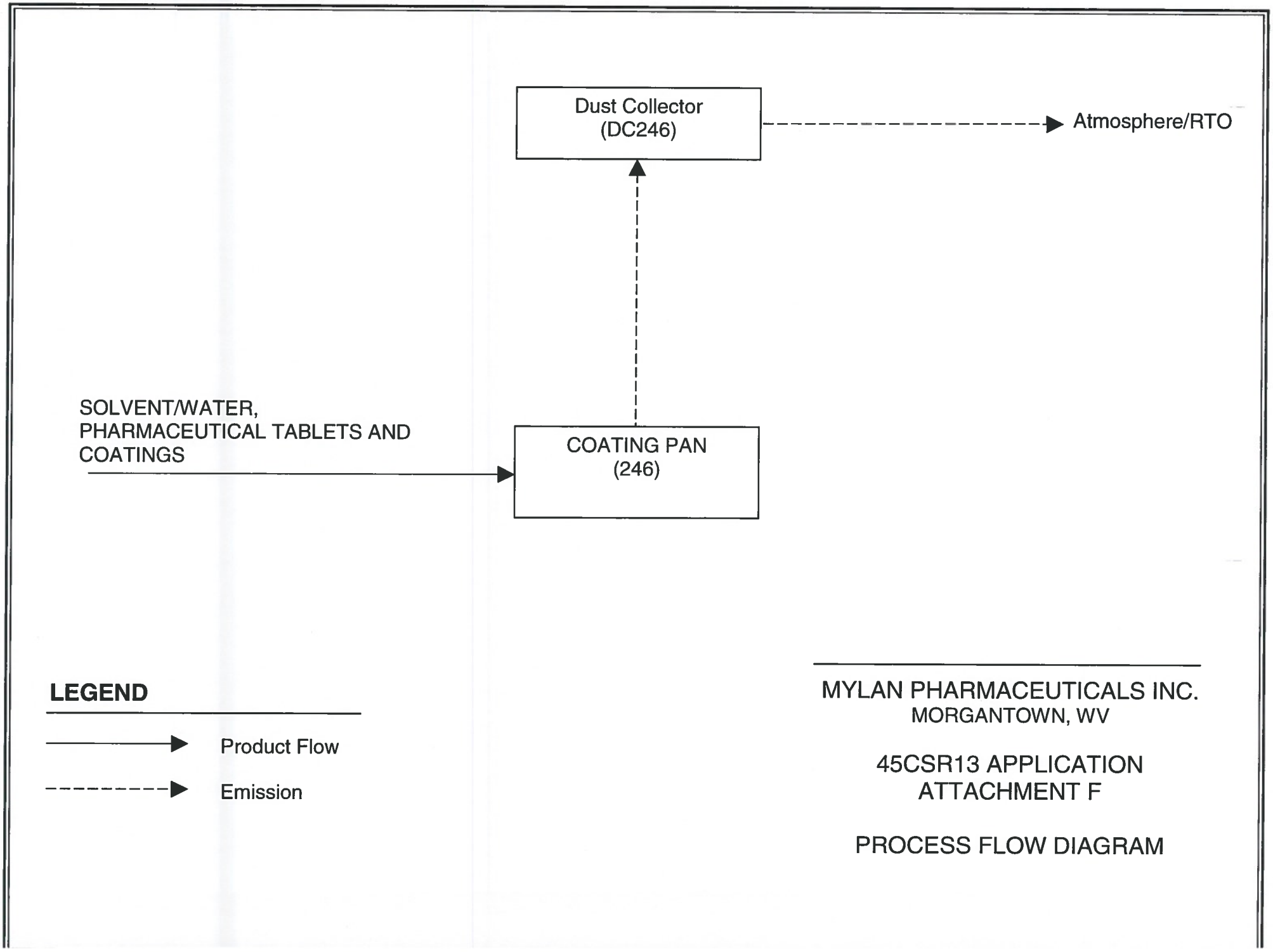


DRAWING CREATED ON 08/26/2009

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Attachment F

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


Dust Collector
(DC246)
Atmosphere/RTO
SOLVENT/WATER,
PHARMACEUTICAL TABLETS AND
COATINGS
COATING PAN
(246)
LEGEND
Product Flow
Emission
MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV
45CSR13 APPLICATION
ATTACHMENT F
PROCESS FLOW DIAGRAM

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.

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[1]	Emission Point ID[2]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type[3] and Date of Change	Control Device[4]
246	*246*	*Coating Pan*	*2015*	*750 lb/load maximum*	*New*	*Cartridge Dust Collector DC246*

[1] For Emission Units (or Sources) use the following numbering system:1S, 2S, 3S,... or other appropriate designation
[2] For Emission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation
[3] New, modification, removal
[4] 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[1]	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[3] *(Speciate VOCs & HAPS)*	Maximum Potential Uncontrolled Emissions [4]		Maximum Potential Controlled Emissions [5]		Emission Form or Phase *(At exit conditions, Solid, Liquid or Gas/Vapor)*	Est. Method Used [6]	Emission Concentration [7] (ppmv or mg/m^4)
		ID No.	Source	ID No.	Device Type	Short Term[2]	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
246	Upward vertical stack/Tee Damper to RTO	246	Coating Pan 246	DC246	Cartridge Dust Collector	N/A	N/A	PM	16.88	41.78	0.84	6.25 is current limit in R13-2068Q and Title V for Emission Units 215, 241, 242, 244 and 245 (246 to be included)	Solid; Particulate	MB	N/A
				RTO 10008085	Regenerative Thermal Oxidizer (RTO)	N/A	N/A	VOCs	396.9	5.0 tons/yr is current Coating Pan limit in R13-2068Q and Title V	7.94	5.0 tons/yr is current Coating Pan limit in R13-2068Q and Title V	Gas	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.

[1] Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

[2] 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).

[3] List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS_2, VOCs, H_2S, Inorganics, Lead, Organics, O_3, NO, NO_2, SO_2, SO_3, all applicable Greenhouse Gases (including CO_2 and methane), etc. **DO NOT LIST** H_2, H_2O, N_2, O_2, and Noble Gases.

[4] 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).

[5] 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).

[6] 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).

[7] 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^3) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO_2, use units of ppmv (See 45CSR10).

Attachment J
EMISSION POINTS DATA SUMMARY SHEET

Table 2: Release Parameter Data								
Emission Point ID No. *(Must match Emission Units Table)*	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow [1] (acfm) *at operating conditions*	Velocity (fps)	Ground Level *(Height above mean sea level)*	Stack Height [2] *(Release height of emissions above ground level)*	Northing	Easting
246	N/A	45°C - 80°C	4000 CFM	N/A	~1000	~30 ft	Approx: Zone 17; 4390.554097142205 (Lat 39.660129)	Approx: Zone 17; 589.3285978954759 (Long -79.958659)

[1] Give at operating conditions. Include inerts.
[2] Release height of emissions above ground level.

APPLICATION FOR NSR PERMIT
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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*): Coating Pan 246

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 246. Certain products may be mixed with water and/or non-HAP solvents.

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 246.

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 $\times 10^6$ 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_X	N/A	lb/hr	N/A	grains/ACF
b.	SO_2	N/A	lb/hr	N/A	grains/ACF
c.	CO	N/A	lb/hr	N/A	grains/ACF
d.	PM_{10}	16.88	lb/hr	n/a	grains/ACF
e.	Hydrocarbons	N/A	lb/hr	N/A	grains/ACF
f.	VOCs	396.9	lb/hr		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.

MONITORING	RECORDKEEPING
Quarterly visible emission observations (conducted on external cartridge collector)	Keep monthly records of non-HAP alcohol used, number of batches in which non-HAP alcohol was used, the number of hours for each batch.
REPORTING N/A	TESTING N/A

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
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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): DC246

Equipment Information and Filter Characteristics

1. Manufacturer: Torit
   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: 1yes

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: (check one)
   ☐ Open Pressure ☒ Closed Pressure ☐ Closed Suction
   ☐ Electrostatically Enhanced Fabric
   ☐ Other, Specify

6. Filter Fabric Bag Material:
   ☐ Nomex nylon ☐ Wool
   ☐ Polyester ☐ Polypropylene
   ☐ Acrylics ☐ Ceramics
   ☐ Fiber Glass
   ☐ Cotton Weight oz./sq.yd
   ☐ Teflon Thickness in
   ☒ Others, specify Ultra-Web

7. Bag Dimension:
   Diameter n/a in.
   Length n/a ft.

8. Total cloth area: 1068 ft^2

9. Number of bags: 12 cartridges

10. Operating air to cloth ratio: n/a ft/min

11. Baghouse Operation: ☐ Continuous ☐ Automatic ☒ Intermittent

12. Method used to clean bags:
   ☐ Mechanical Shaker ☐ Sonic Cleaning ☐ Reverse Air Jet
   ☐ Pneumatic Shaker ☐ Reverse Air Flow ☐ Other:
   ☐ Bag Collapse ☒ Pulse Jet
   ☐ Manual Cleaning ☐ Reverse Jet

13. Cleaning initiated by:
   ☒ Timer ☐ Frequency if timer actuated
   ☐ Expected pressure drop range in. of water ☐ 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^3/min

20. Stabilized static pressure loss across baghouse. Pressure Drop: High in. H_2O
   Low in. H_2O

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_3 in the emission stream? ☒ No ☐ Yes SO_3 content: ppmv

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

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

25. Complete the table:

	Particle Size Distribution at Inlet to Collector	**Fraction Efficiency of Collector**
Particulate Size Range (microns)	**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?

As Cartridge Collector

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:	RECORDKEEPING:
Quarterly visual emission observations.	Maintain records of visual emission observations.
REPORTING:	TESTING:
None	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

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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. A new coating pan is being installed due to new product forecasts and production requirements. The coating pan will be capable of applying both aqueous and solvent based solutions to tablets. The associated dust collector will be installed to capture particulate emissions from tablet breakage or solution overspray. The coating pan will be connected to the Regenerative Thermal Oxidizer (RTO) system to control VOC emissions. The coating pan will have permitted flexibility to emit to atmosphere or to the RTO as long as emission limits are met.

Plant: Mylan Pharmaceuticals Inc. - Morgantown, WV (WVDAQ ID# 06100033)
Reason for Application: New Coating Pan
Process/Equipment Affected: New Coating Pan 246 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)
246	Coating Pan - Particulate Matter	750 lb/hr dry raw materials	246	P	Dust Collector	DC - 246	95	Total PM	N	MB	16.88	0.84	varies	6.25 all coating pans
	Coating Pan - VOC emissions from processing with non-HAP solvents	3000 g/min spray rate	246	P	None; VOCs emitted to atmosphere	N/A	N/A	VOC	N	MB	396.9	N/A		Total VOC limit for all applicable Coating Pans is currently permitted at 5 tons/yr
	Coating Pan - VOC emissions from processing with non-HAP solvents	3000 g/min spray rate	246	P	RTO for VOC Destruction	RTO 10008085	98%	VOC	N	MB	396.9	7.94		

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

2. VOLATILE ORGANIC COMPOUNDS (VOC)

a. Assume 100% of VOC (IPA/Ethanol) added to coating pans is emitted to atmosphere, except VOC exhausted to RTO.
b. Maximum alcohol production feed rate to a coating pan is 3000 g/min (3 kg/min) (spray application is not 100% VOC, but is assumed here for maximum emission estimates)
c. Production maximum VOC emitted = 3 kg/min * 60 min/hr * 2.205 lb/kg = 396.9 lb/hr
d. Uncontrolled Hourly limit = 396.9 lb/hr

VOC Emissions Controlled by RTO

e. RTO control efficiency: 98% (per Permit R13-2068Q)
f. RTO Controlled Hourly Limit = 396.9 lb/hr * (1-0.98) = 7.94 lb/hr

Overall Coating Pan Annual VOC Emissions

g. Annual limit = 5.0 tpy (As currently stated in R13-2068Q. Value based on product type and forecast, and use of RTO. Value is not dependent on hourly rates.)

Note: Coating Pans are authorized to emit to the RTO and to the atmosphere.

NOTES:

[1] P=Point, F=Fugitive, S=Secondary
[2] EF=Emission Factor, MB=Material Balance, EN=Engineering Calculation, MO=Monitoring/Measurement

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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: 0.17 tons per year of particulate emissions.

Startup of operation is planned to begin on or about the 1st day of November, 2015. 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 9th day of July, 2014.

By: Mylan Pharmaceuticals Inc.
Scott Denicourt
General Manager and Vice President, Morgantown Operations
P.O. Box 4310
Morgantown, WV 26504-4310

APPLICATION FOR NSR PERMIT
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Attachment S

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

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary

Mark all applicable requirements associated with the changes involved with this permit revision:

☐ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS (Subpart(s)_____)	☐ Section 112(d) MACT standards (Subpart(s)_____)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64) (1)
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)

(1) If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

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). Mylan's Title V permit renewal will be submitted by July 10, 2016 to comply with an expiration date of January 10, 2017.

2. Non Applicability Determinations

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.

The regulatory discussion outlining non-applicable air quality requirements are contained in Attachment D of this permit application.

☐ **Permit Shield Requested** *(not applicable to Minor Modifications)*

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

3. Suggested Title V Draft Permit Language

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
R13-2068Q	09/29/2014	
R30-06100033-2012 MM03	12/02/2014	
	/ /	

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	+0.0 tpy (new coating pan will operate under existing 6.25 ton PM limit for all coating pans)
VOCs	+0.0 tpy (new coating pan will operate under existing 5.0 ton VOC limit for all coating pans)

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: 9 / 28 / 15 *(Please use blue ink)*

Named (typed): *Dale L. Stemple* Title: *Vice President, Global Environmental, Health and Safety*

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

☐	Compliance Assurance Monitoring Form(s)
☒	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
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Appendix 2

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

West Virginia Department of Environmental Protection

Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit for Modification

R13-2068R

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: DRAFT

This permit will supersede and replace Permit R13-2068Q issued on September 29, 2014.

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:	Modification
Description of Change:	Installation of a new coating pan (246) and an associated cartridge collector (CC246).

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.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device[1]
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
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

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device[1]
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

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device[1]
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
533	533	Fluid Bed 527	1991	Up to 575 Kg/Load	CC EF527
534	534, 10008085[2]	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
537	537	Fluid Bed 1552	1997	Up to 575 Kg/Load	CC EF1552

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device[1]
538	538, 10008085[2]	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[2]	Fluid Bed 2181	2004	Up to 250 Kg/Load	CC EF2181; RTO
573	573, 10008538[2]	Fluid Bed 2811	2006	Up to 575 Kg/Load	CC 3340; Absorber
574	574, 10008085[2]	Fluid Bed 3287	2006	Up to 250 Kg/Load	CC 3416; RTO
575	575, 10008085[2]	Fluid Bed 3620	2007	Up to 250 Kg/Load	CC 3643; RTO
576	576, 10008085[2]	Fluid Bed 3426	2007	Up to 575 Kg/Load	CC 3407; RTO
577	577, 10008085[2]	Fluid Bed 3704	2008	Up to 250 Kg/Load	CC 3881; RTO
578	578, 10008085[2]	Fluid Bed 3705	2008	Up to 575 Kg/Load	CC 3879; RTO
579	579, 10008538[2]	Fluid Bed 4001	2008	Up to 575 Kg/Load	CC 4287; Absorber
580	580, 10008085[2]	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
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[2]	Coating Pan 7552	2010	750 lbs/load	CC EF7674; RTO
245	245, 10008085[2]	Coating Pan 8421	2010	750 lbs/load	CC 8422; RTO
246	246, 10008085[2]	Coating Pan 246	2015	750 lbs/load	CC 246; RTO
260	260, 10008085[2]	Oven 19	<1973	Electric, Load Varies	RTO

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device(1)
261	261, 10008085(2)	Oven 18	<1973	Electric, Load Varies	RTO
264	264, 10008085(2)	Oven 0021	2013	Electric, Load Varies	RTO
1911	1911, 10008085(2)	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

CAAA	Clean Air Act Amendments	**NO_X**	Nitrogen Oxides
CBI	Confidential Business Information	**NSPS**	New Source Performance Standards
CEM	Continuous Emission Monitor	**PM**	Particulate Matter
CES	Certified Emission Statement	**$PM_{2.5}$**	Particulate Matter less than 2.5 µm in diameter
C.F.R. *or* CFR	Code of Federal Regulations	**PM_{10}**	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	**Ppb**	Pounds per Batch
C.S.R. *or* CSR	Codes of State Rules	**Pph**	Pounds per Hour
DAQ	Division of Air Quality	**Ppm**	Parts per Million
DEP	Department of Environmental Protection	**Ppm_V or ppmv**	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	**PSD**	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	**Psi**	Pounds per Square Inch
HAP	Hazardous Air Pollutant	**SIC**	Standard Industrial Classification
HON	Hazardous Organic NESHAP	**SIP**	State Implementation Plan
HP	Horsepower	**SO_2**	Sulfur Dioxide
lbs/hr	Pounds per Hour	**TAP**	Toxic Air Pollutant
LDAR	Leak Detection and Repair	**TPY**	Tons per Year
M	Thousand	**TRS**	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	**TSP**	Total Suspended Particulate
MDHI	Maximum Design Heat Input	**USEPA**	United States Environmental Protection Agency
MM	Million	**UTM**	Universal Transverse Mercator
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour	**VEE**	Visual Emissions Evaluation
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour	**VOC**	Volatile Organic Compounds
NA	Not Applicable	**VOL**	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	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 R13-2068P. 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 R13-2068Q, 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.

[WV Code § 22-5-4(a)(15)]

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 Review (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 007, 008, 010, 011, 012, & 013]

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)*

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)*

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 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_2 Limits

Emission Unit	SO_2 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 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_x	0.70	3.07
$PM_{2.5}/PM_{10}/PM^{(1)}$	0.10	0.30
SO_2	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_x	0.70	3.07
$PM_{2.5}/PM_{10}/PM^{(1)}$	0.10	0.30
SO_2	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 015 Emission Limits

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	0.59	2.58
NO_x	0.70	3.07
$PM_{2.5}/PM_{10}/PM^{(1)}$	0.10	0.30
SO_2	0.10	0.10
VOCs	0.10	0.20

(1) Including Condensables

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

Table 5.1.8.: 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_x	2.06	9.02
$PM_{2.5}/PM_{10}/PM^{(1)}$	0.20	0.86
SO_2	0.02	0.05
VOCs	0.21	0.92

(1) Including Condensables

5.1.9. The maximum amount of natural gas to be burned by a single boiler (Emission Points ID# 007, 008, 010) shall not exceed 7,000 cubic feet/hour or 61,320,000 cubic feet/year.

5.1.10. The three (3) Bryan Steam Corporation boilers (Emission Points ID # 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)*

5.2.2. The facility shall monitor the amount of natural gas used on a monthly and yearly basis for Boilers 007, 008, 010, 011, 012, &013.

5.2.3. The facility shall monitor the hours of operation on a monthly and yearly basis of the Boilers 007, 008, 010, 011, 012, & 013.

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)*

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)*

5.5. Reporting Requirements

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

6.0. Source-Specific Requirements [Fluid Beds 533, 534, 535, 536, 537, 538, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, & 582]

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

Emission Unit	PM Emission Limit (lb/hr)
Size 60 534, 536, 538, 572, 574, 575, 577, 581	0.46
Size 300 533, 535, 537, 571, 573, 576, 578, 579, 580, 582	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 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 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 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 534, 536, 538, 572, 574, 575, 577, 581: 250 kg/load
(2) Fluid Beds 533, 535, 537, 571, 573, 576, 578, 579, 580, 582: 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 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 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 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 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 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 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 534, 538, and 572 – 580.

(2) The total amount of VOCs in pounds used in Fluid Beds 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 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 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 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 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

Emission Point	PM Emission Limit (lb/hr)
287, 288, 291, 294, & 295	1.20(1)
282, 296-300, 305-322	2.12(2)
323	1.16(3)

(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.

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 305-323, 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 215, 241, 242, 244, 245, 246]

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

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 (215, 241, 242, 244, 245, and 246) at Emission Point ID Numbers 215, 241, 242, 244, 245, and 246 shall not exceed the following:

Table 8.1.3.: Coating Pans $PM_{2.5}/PM_{10}/PM$ Emission Limits

Emission Unit	$PM_{2.5}/PM_{10}/PM$ 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	

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 215: 750 pound/load;
(2) Coating Pan 241: 750 pound/load;
(3) Coating Pan 242: 245 pound/load;
(4) Coating Pan 244: 750 pound/load;
(5) Coating Pan 245: 750 pound/load; and
(6) Coating Pan 246: 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 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 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 reading s 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 manufacture'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 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 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 244, 245, and 246.

(2) The total amount of VOCs in pounds used in Coating Pans 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 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 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:

Emissions (lb/hr) = F x 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

Incinerator Capacity	Factor F
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

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	28.76	10.44
NO_x	49.11	14.90
PM	2.68	0.96
PM_{10}	2.68	0.96
$PM_{2.5}$	2.68	0.96
SO_2	0.08	0.05

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
VOCs	61.49	6.59

9.1.4. The RTO shall be operated according to the following requirements:

a. The aggregate MDHI of the natural gas burner(s) shall not exceed 16.00 mmBtu/hr;

b. 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

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.

9.1.5. The RTO shall, at all times when Fluid Beds 534, 538, 572, 574 – 578, and 580; Coating Pans 244, 245, and 246; Oven Dryers 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 534, 538, 572, 574 – 578, and 580; Coating Pans 244, 245, and 246; Oven Dryers 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 534, 538, 572, 574 – 578, and 580; Coating Pans 244, 245, and 246; Oven Dryers 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 reading s 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 534, 538, 572, 574 – 578, and 580; Coating Pans 244, 245, and 246; Oven Dryers 260, 261, and 264; and the Coating Line. The monthly and rolling twelve month total of solvent sent to RTO from Fluid Beds 534, 538, 572, 574 – 578, and 580; Coating Pans 244, 245, and 246; Oven Dryers 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_x 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 260, 261, 264]

10.1. Limitations and Standards

10.1.1. Maximum hourly volatile organic compound emissions to the atmosphere from Oven Dryers 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; and

b. 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 260, 261, and 264 shall not exceed 5.0 tons/year.

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

a. Each Oven Dryer 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.

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 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 260, 261, and 264 by summing the following:

(1) The total amount of VOCs in pounds used in Oven Dryers 260, 261, and 264 when not venting exhaust to the RTO for the purpose of controlling VOCs; and

(2) The total amount of VOCs used in Oven Dryers 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 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 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 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 form 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

(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 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[1] _____ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title _____ _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

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[1] 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.

West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate

Pursuant to
Title V
of the Clean Air Act

Issued to:
Mylan Pharmaceuticals
Morgantown
R30-06100033-2012

John A. Benedict
Director

Issued: January 10, 2012 • Effective: January 24, 2012

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
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(2)	CC EF7674*; RTO	244	Coating Pan 7552	750 lb/load	2010
245; 10008085(2)	CC 8421*; RTO	245	Coating Pan 8421	750 lb/load	2010
246	CC246; RTO	246	Coating Pan 246	~~682~~750 lbs/load	2015

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/ Modified
260; 10008085(2)	RTO*	260	Oven 19	Varies	Prior to 1973
261; 10008085(2)	RTO*	261	Oven 18	Varies	Prior to 1973
264; 10008085(2)	RTO*	264	Oven ~~0021~~ 0021	Electric, Load Varies	2013
1911; 10008085(2)	RTO*	1911	Coating Line 1911~~1911~~	10.77 lb/hr	2014
280	Rotoclone 4	Rooms 74-101 – 74-122, 74-129	Room General Exhaust	Varies	1992 (Rotoclone)
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 (Rotoclone)
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~~-~~equipment serviced by Rotoclone	Varies	1982 (Rotoclone)
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, BB 106, 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
575; 10008085(2)	CC 3643; RTO*	575	Fluid Bed 3620	Up to 250 Kg/Load	2007
576; 10008085(2)	CC 3407; RTO*	576	Fluid Bed 3426	Up to 575 Kg/Load	2007
577; 10008085(2)	CC 3881; RTO*	577	Fluid Bed 3704	Up to 250 Kg/Load	2008
578; 10008085(2)	CC 3879; RTO*	578	Fluid Bed 3705	Up to 575 Kg/Load	2008
579; 10008583(2)	CC 4287*; Absorber	579	Fluid Bed 4001	Up to 575 Kg/Load	2008
580; 10008085(2)	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
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 bph/1,800 rpm	2010
10008594	None	10008594	Kohler 100 REZG Natural Gas Fired Emergency Generator	162 bph/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
323	CC 10023125	Rooms 87-103 to 87-117	Room General Exhaust	Varies	2014

*Identifies pollution control equipment included in R13-2068~~P~~Q.
(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

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.

~~b.~~

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 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review (3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

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. 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.]

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 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 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 534, 538, and 572 – 580.

(2) The total amount of VOCs in pounds used in Fluid Beds 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 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 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 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 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.)]

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

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 Emission Unit ID No. 215, 241, 242, 243, 244, and 245), 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 Pans 243, 750 pounds per hour, the corresponding allowable particulate matter emission rate is 0.9 pounds per hour.
[45CSR§7-4.1] *(210, 220, 230, 240, 243)*

7.1.3. Particulate matter emissions from the Coating Pan, venting through a cartridge collector (215, 241, 242, 244, 245) at Emission Point ID No. 215, 241, 242, 244, and 245, shall not exceed the following:

Emission Unit	$PM_{2.5}/PM_{10}/PM$ Emission Limit	
	Pounds per Hour	Tons per Year
215	0.84	6.25~~8.32~~
241	0.84	
242	0.28	
244	0.84	
245	0.84	
246	0.84	

[45CSR§7-4.1 and 45CSR13, Permit No. R13-2068 (Condition 8.1.3)] *(215, 241, 242, 244, 245, 246) 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 244 and 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 215: 750 pound/load;
(2) Coating Pan 241: 750 pound/load;
(3) Coating Pan 242: 245 pound/load;
(4) Coating Pan 244: 750 pound/load;
(5) Coating Pan 245: 750 pound/load;
~~(5)~~(6) Coating Pan 246: 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 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 244~~, and~~ 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 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.)] *(215, 241, 242, 244, 245, 246)*

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 244~~,~~ ~~and~~ 245 and 246.

b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Coating Pans 244~~,~~ ~~and~~ 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 244~~,~~ ~~and~~ 245 and 246.

(2) The total amount of VOCs in pounds used in Coating Pans 244~~,~~ ~~and~~ 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 244~~,~~ ~~and~~ 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 244~~,~~ ~~and~~ 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

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 534, 538, 572, 574 – 578, and 580; Coating Pans 244, ~~and~~ 245, and 246; Oven Dryers 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 534, 538, 572, 574 – 578, and 580; Coating Pans 244, ~~and~~ 245, and 246; Oven Dryers 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 534, 538, 572, 574 – 578, and 580; Coating Pans 244, ~~and~~ 245, and 246; Oven Dryers 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 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.)]

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 534, 538, 572, 574 – 578, and 580; Coating Pans 244, ~~and~~ 245, and 246; Oven Dryers 260, 261 and 264; and the coating line. The monthly and rolling twelve month total of solvent sent to RTO from Fluid Beds 534, 538, 572, 574 – 578, and 580; Coating Pans 244, ~~and~~ 245, and 246; Oven Dryers 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 manufacture'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_x 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.)]

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 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 Dryer~~s~~ 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 ~~the~~ Oven Dryers 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 Dryer~~s~~ 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 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 260, 261, and 264 by summing the following:

(1) The total amount of VOCs in pounds used in Oven Dryers 260, 261, and 264 when not venting exhaust to the RTO for the purpose of controlling VOCs; and

(2) The total amount of VOCs used in Oven Dryers 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 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 ~~the~~ Oven Dryers 260, 261, and 264 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 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

12.0. Coating Line [emission point ID(s): TBD 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.)]

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 coating pan unit as part of this permit application. This coating pan is a stand-alone project and is being added due to current production demand and future forecasting. The following table outlines increases in Particulate Matter emissions based on the past 4 years of permit applications:

Permit Name	Application Date	Increase in PM	Description of Changes
R13-2068O	June 2011	0 tons	• Modifications to RTO, Absorber, and Fluid Bed maximum load information
R13-2068P	July 2013	-0.31 tons	• The addition of a cartridge collector to control particulate matter emissions from production rooms, • The replacement of an existing rotoclone with a new rotoclone, • The addition of a pilot coating line for research and development, • PM limit decrease for coating pans, • VOC limit decrease for fluid beds, and • The addition of a new oven dryer (replaces an existing oven dryer).
R13-2068Q	July 2014	0.43 tons	• 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.
R13-2068R	Pending July 2015, revised September 2015	0 tons	• The addition of a coating pan and associated dust collector to the facility.

Based on no emissions 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.