



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

July 7, 2016

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 (R13-2068S) and Title V Permit (R30-06100033-2012 MM05) Modifications

Dear Sir or Madam:

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

- The addition of a new fluid bed and associated cartridge type dust collector
- The addition of a new boiler
- The replacement of a cartridge style dust collector for an existing fluid bed
- The replacement of cartridge style dust collectors for two existing coating pans

Enclosed is the following information completing said permit application:

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

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jonathan Lewin', written in a cursive style.

Jonathan Lewin
Environmental Engineer, MPI Environmental, Health and Safety

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

July 2016

**REGULATION 13 CLASS II
ADMINISTRATIVE UPDATE**

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

PREPARED BY:

Mylan Pharmaceuticals Inc.

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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/dag

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

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

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

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

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

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

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

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): Mylan Pharmaceuticals Inc.		2. Federal Employer ID No. (FEIN): 5 5 0 4 5 5 4 2 3	
3. Name of facility (if different from above): 4. Chestnut Ridge Facility		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: P.O. Box 4310 Morgantown, WV 26504-4310		5B. Facility's present physical address: 781 Chestnut Ridge Road Morgantown, WV 26505	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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 <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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): R13-2068R, issued November 3, 2015 R30-06100033-2012 MM04, issued March 22, 2016	
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.			

12A.

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

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

12.B. New site address (if applicable):

N/A

12C. Nearest city or town:

Morgantown

12D. County:

Monongalia

12.E. UTM Northing (KM): 4390.1

12F. UTM Easting (KM): 589.6

12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:

Mylan proposes to add a new fluid bed unit due to increases in production demand. An associated dust collector will be installed to control particulate emissions. An additional boiler will be installed. Three (3) replacement dust collectors will be installed for two existing coating pans and one existing fluid bed.

14A. Provide the date of anticipated installation or change: Modification: 08/22/2016

- 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:

10/10/2016

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:

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

General Emission Unit, specify: Fluid Bed, Boiler,
 Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

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

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

Other Collectors, specify:
 Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

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

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

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

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

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?
 YES NO

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

Section III. Certification of Information

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

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

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

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

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

Certification of Truth, Accuracy, and Completeness

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

Compliance Certification

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

SIGNATURE  (Please use blue ink) DATE: 07.07.2016 (Please use blue ink)

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

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

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

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

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

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

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

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Attachment A

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

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

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

BUSINESS REGISTRATION ACCOUNT NUMBER: 1034-8407

This certificate is issued on: 06/24/2010

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

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

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

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

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

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

STATE OF WEST VIRGINIA
State Tax Department
P. O. Box 2666
Charleston, WV 25324-2666



Joe Manchin III, Governor

Craig A. Griffith, Acting Tax Commissioner

MYLAN PHARMACEUTICALS
PO BOX 4310
MORGANTOWN WV 26504-4310

Letter ID: L2137111296
Issued: 06/24/2010

RE: Business Registration Certificate

The West Virginia State Tax Department would like to thank you for registering your business. Enclosed is your Business Registration Certificate. This certificate shall be permanent until cessation of business or until suspended, revoked or cancelled. Changes in name, ownership or location are considered a cessation of business; a new Business Registration Certificate and applicable fees are required. Please review the certificate for accuracy.

This certificate must be prominently displayed at the location for which issued. Engaging in business without conspicuously posting a West Virginia Business Registration Certificate in the place of business is a crime and may subject you to fines per W.Va. Code § 11-9.

When contacting the State Tax Department, refer to the appropriate account number listed on the back of this page. The taxes listed may not be all the taxes for which you are responsible. Account numbers for taxes are printed on the tax returns mailed by the State Tax Department. Failure to timely file tax returns may result in penalties for late filing.

Should the nature of your business activity or business ownership change, your liability for these and other taxes will change accordingly.

To learn more about these taxes and the services offered by the West Virginia State Tax Department, visit our web site at www.wvtax.gov.

Enclosure

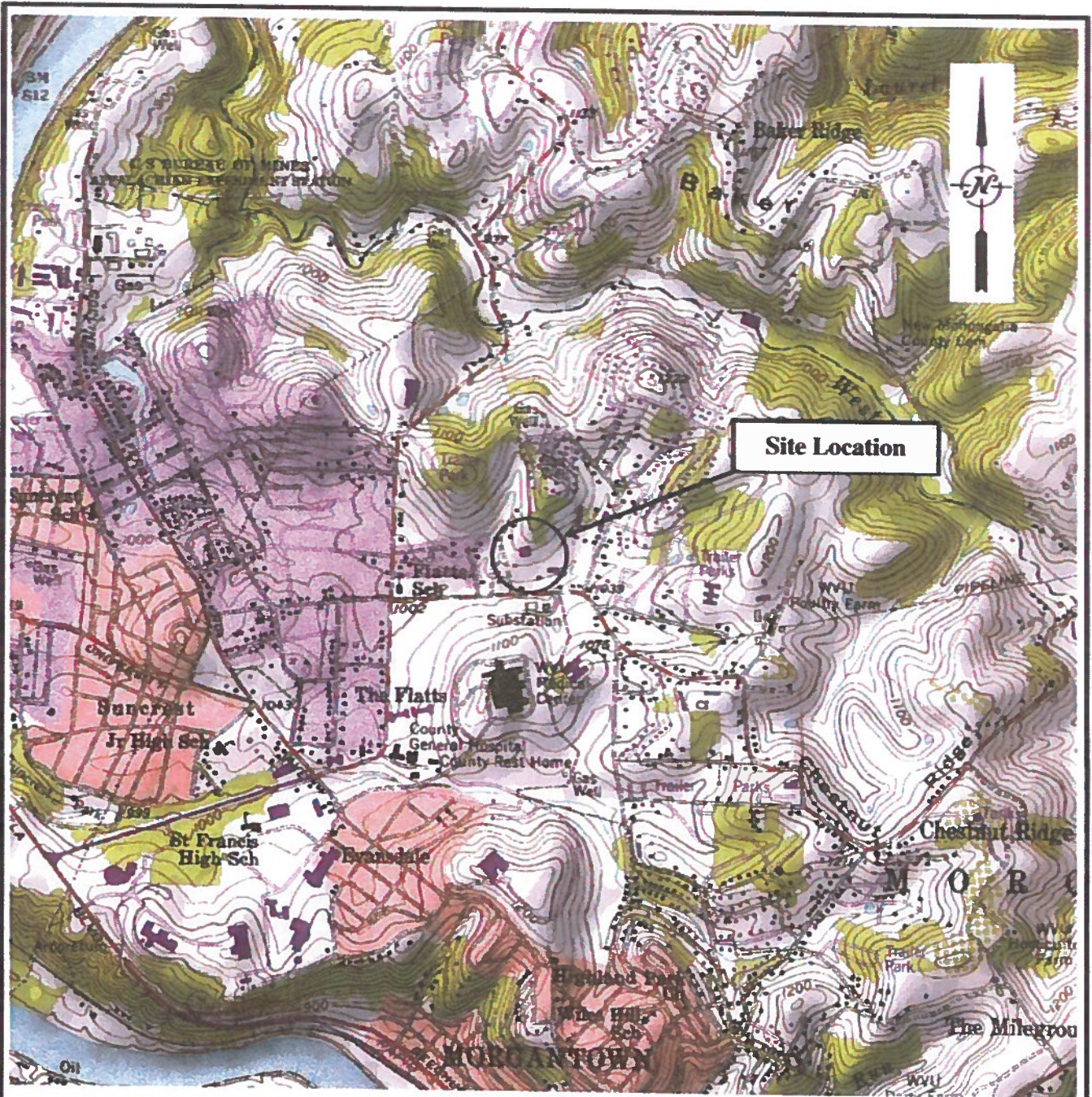
atL006 v.1

Taxpayer Services Division ■ P.O. Box 3784 ■ Charleston, WV 25337-3784
(304) 558-3333 ■ Toll Free (800) 982-8297 ■ www.wvtax.gov

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 Fluid Bed and associated dust collector (Not to be connected to Regenerative Thermal Oxidizer (RTO))	October 30, 2016	December 19, 2016
New 6.0 MMBtu/hr Boiler	August 22, 2016	October 10, 2016
Replacement of cartridge dust collector EF527 on Fluid bed #527	Existing	July 13, 2016
Replacement of cartridge dust collector EF7674 on Coating Pan #7552	August 30, 2016	September 12, 2016
Replacement of cartridge dust collector 8422 on Coating Pan #8421	October 17, 2016	November 14, 2016

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	Fluid Bed #TBD	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		PM emission limits from all PM-emitting vent points other than the boilers vent points.	Proper operation and maintenance of cartridge collectors.
45CSR2-3.1	Boiler	10% max. opacity from all smoke /PM boiler vent points.	Quarterly visual observation and recordkeeping of visual observations.
Varies	Coating Pan 8421 & 7552 Fluid Bed 527	Replacement of existing dust collection units. No change to existing permit requirements.	No change to existing compliance demonstration.

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.
40CFR60 – All Subparts	All Sources in the proposed modification.	Mylan does not believe that any 40CFR60 NSPS regulations apply to the proposed modification.
40CFR61 – All Subparts	All Sources in the proposed modification.	Mylan does not believe that any 40CFR61 NESHAPS regulations apply to the proposed modification.

ATTACHMENT D – REGULATORY DISCUSSION

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



WV NET

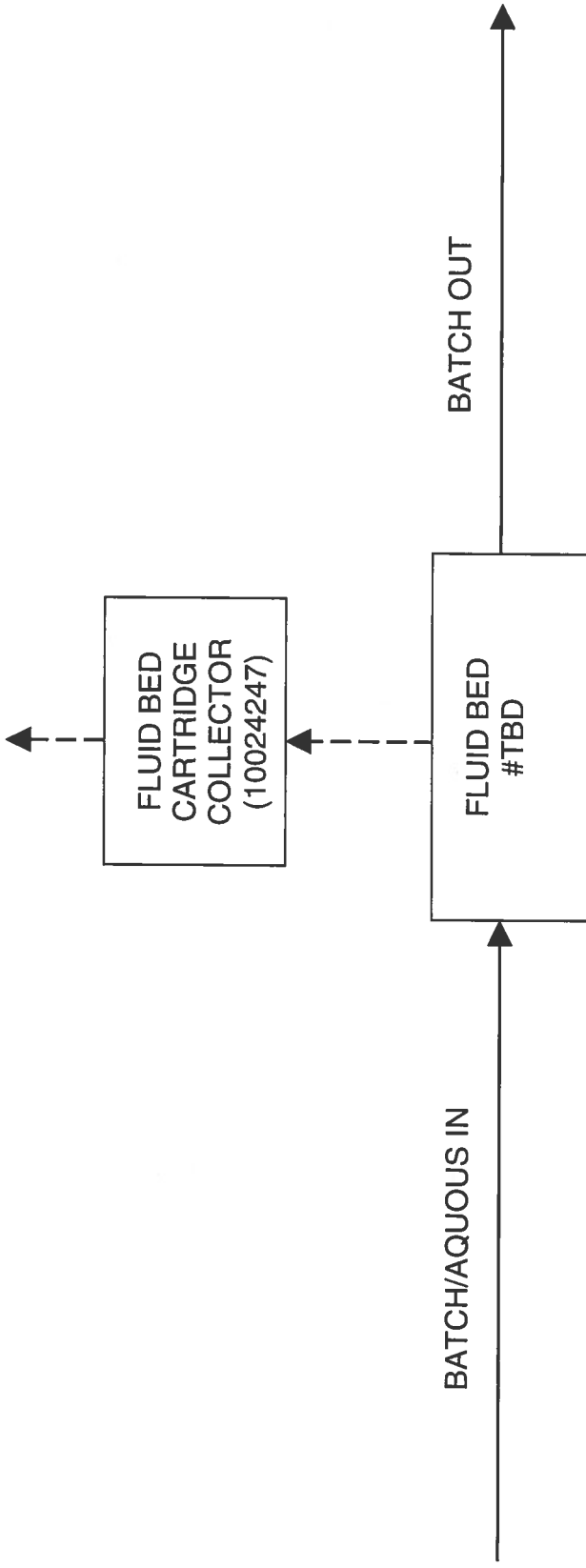
Drawing created on 07/06/2016

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION



Attachment F

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

VENT DIRECTLY TO
ATMOSPHERE
(EP 583)



LEGEND

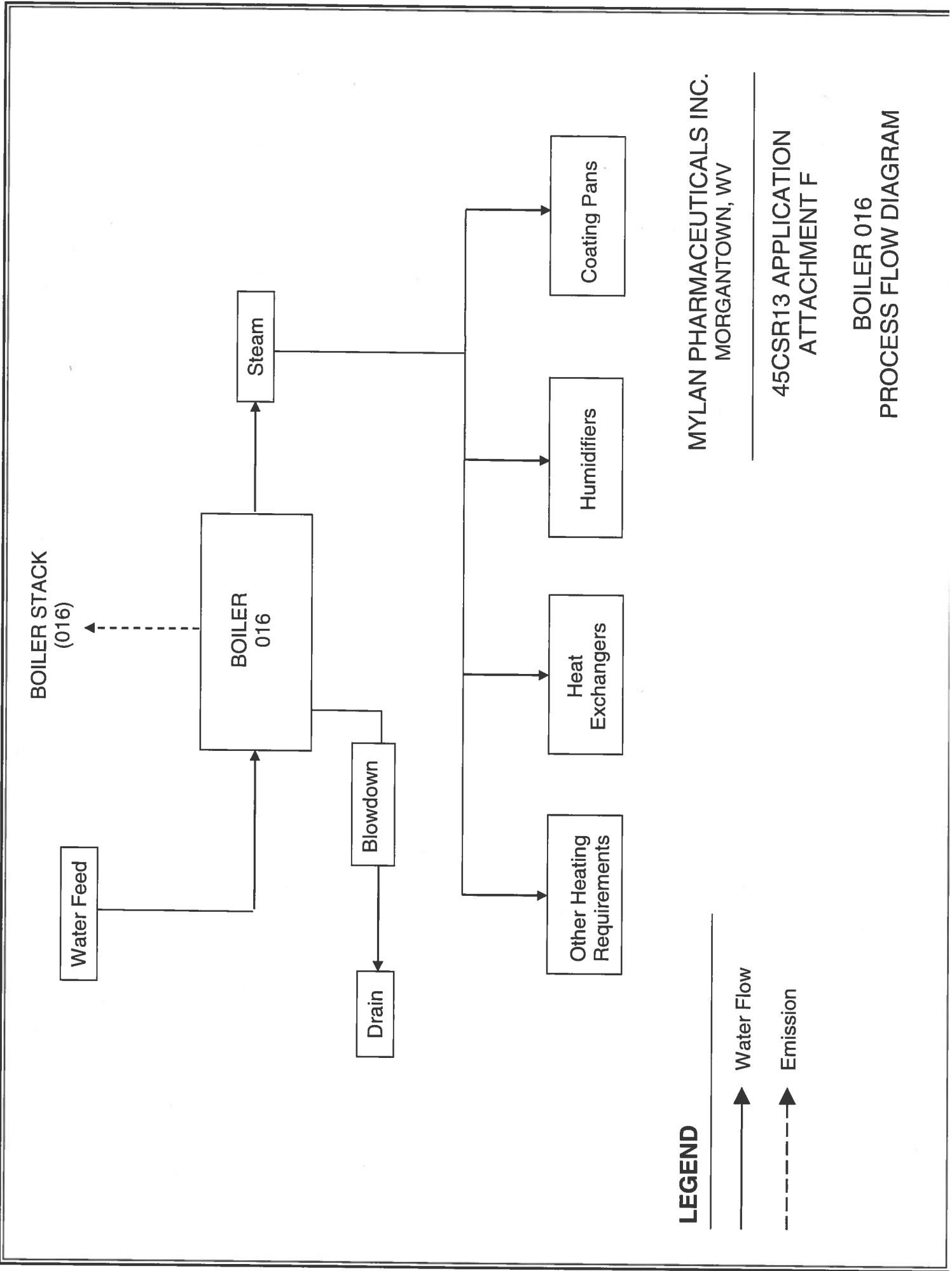
-  Product Flow
-  Emission

NOTE: FLUID BED NOT TO BE
CONNECTED TO RTO

MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV

45CSR13 APPLICATION
ATTACHMENT F

FLUID BED
PROCESS FLOW DIAGRAM



LEGEND

—→ Water Flow

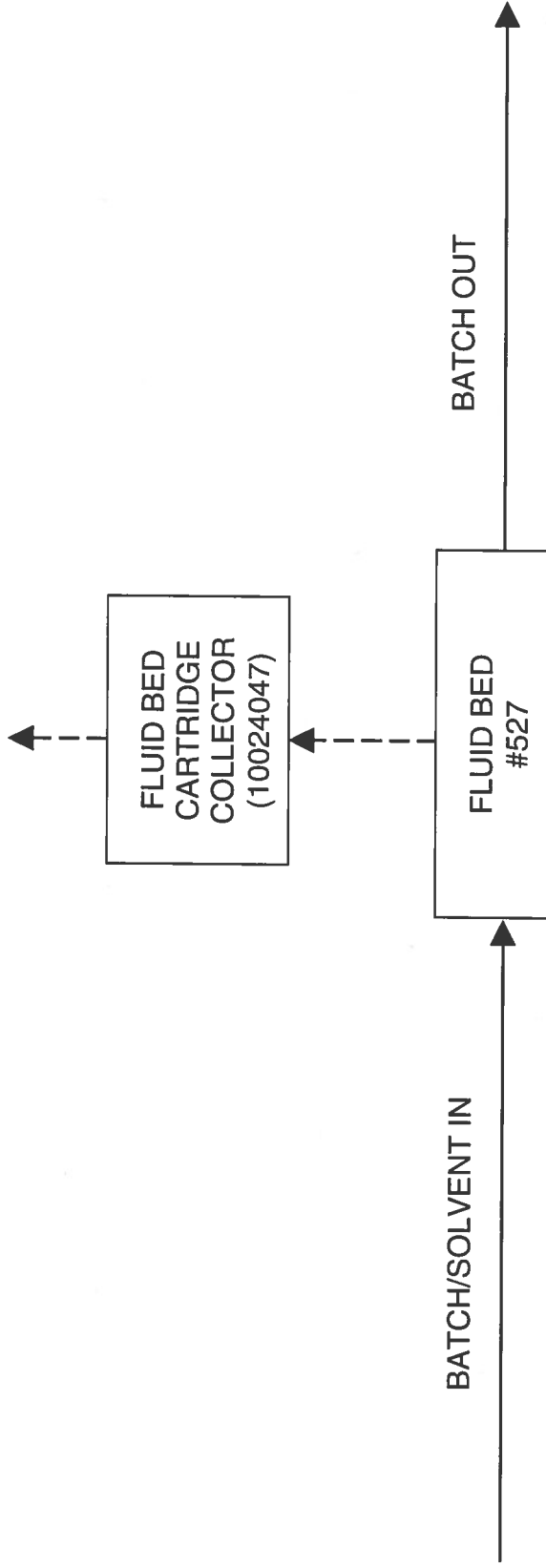
- - - - -→ Emission

MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV

45CSR13 APPLICATION
ATTACHMENT F

BOILER 016
PROCESS FLOW DIAGRAM

VENT DIRECTLY TO
ATMOSPHERE
(EP 533)



LEGEND

- Product Flow
- - - Emission

NOTE: FLUID BED NOT TO BE
CONNECTED TO RTO

MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV

45CSR13 APPLICATION
ATTACHMENT F

FLUID BED #527
PROCESS FLOW DIAGRAM

VENT TO RTO
/ATMOSPHERE
(EP 10008085; EP 244)

COATING PAN
CARTRIDGE
COLLECTOR
(TBD)

SOLVENT/WATER,
PHARMACEUTICAL TABLETS
AND COATINGS

COATING PAN
#7552

TABLETS OUT

LEGEND

- Product Flow
- Emission

MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV

45CSR13 APPLICATION
ATTACHMENT F

COATING PAN
PROCESS FLOW DIAGRAM

VENT TO
RTO/ATMOSPHERE
(EP 10008085; EP 245)

COATING PAN
CARTRIDGE
COLLECTOR
(TBD)

COATING PAN
#8421

SOLVENT/WATER,
PHARMACEUTICAL TABLETS
AND COATINGS

TABLETS OUT

LEGEND

— Product Flow

- - - Emission

MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV

45CSR13 APPLICATION
ATTACHMENT F

COATING PAN
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.

Fluid Bed

The purpose of this application is to install a new fluid bed 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 fluid bed in the same setup that currently exists at the Chestnut Ridge facility for other fluid bed units.

The fluid beds are used to process powder or tablets that are mixed, compounded, and formulated with water and/or solvents. Dry materials are fed into a chamber, and liquids are sprayed onto or mixed into the dry materials depending upon the product being manufactured. The product is then dried using heated air. The exhaust of each fluid bed is controlled by an internal fluid bed filter system and an exhaust air filter cartridge collector unit for particulate matter. Some fluid beds at the facility are connected to an RTO, however the proposed new fluid bed will not be connected to the RTO and is not being permitted for solvent emissions.

Boilers

The purpose of this application is to install a new boiler at the site. The new 6.0 MMBtu/hr boiler, used primarily as a backup, will provide humidification and process steam for air handlers, coating pans, etc. It will be fired using only natural gas.

Coating Pans

The purpose of this application is the replacement of existing cartridge collectors with similar models for two coating pans. The replacement cartridge style dust collectors will be installed downstream of the coating pans in the same setup that currently exist. Both coating pans will remain connected to the RTO. As part of this permit application, the new cartridge style dust collectors will be a new air emission control unit. There are no new emission sources associated with the replacement dust collectors proposed in this application.

The coating pans are used to spray and seal compressed tablets using a formulated coating solution that consists of excipients, water and/or solvents. The tablets are dried using temperature controlled exhaust air. The exhaust of each coating pan is filtered through a cartridge dust collector unit for particulate matter. Coating pans used to process solvents at the facility are connected to the RTO.

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
583	583	<i>Fluid Bed (TBD)</i>	2016	<i>Up to 575 Kg/load maximum</i>	<i>New</i>	<i>Cartridge Dust Collector (CC 10024247)</i>
016	016	<i>Boiler: Natural Gas Boiler (TBD)</i>	2016	6.0 MMBtu/hr	<i>New</i>	<i>None</i>
533	533	<i>Fluid Bed #527</i>	1991	<i>Up to 575 Kg/load maximum</i>	<i>Existing</i>	<i>Cartridge Dust Collector (CC 10024047)</i>
244	244	<i>Coating pan #7552</i>	2010	<i>Up to 750 Kg/load maximum</i>	<i>Existing</i>	<i>Cartridge Dust Collector (CC TBD)</i>
245	245	<i>Coating pan #8421</i>	2010	<i>Up to 750 Kg/load maximum</i>	<i>Existing</i>	<i>Cartridge Dust Collector (CC TBD)</i>

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 ³)	
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr				
583	Upward vertical stack	583	Fluid Bed	10024247	Cartridge Collector	N/A	N/A	PM	0.6	1.49	0.04	0.09	Solid; Particulate	EE	N/A	
016	Upward Vertical stack	016	Boiler	N/A	N/A	N/A	N/A	NO _x	0.59	2.58	N/A	N/A	N/A	Gas	AP-42	N/A
						N/A	N/A	CO	1.16	5.10	N/A	N/A	N/A	Gas	AP-42	N/A
						N/A	N/A	VOC	0.06	0.26	N/A	N/A	N/A	Gas	AP-42	N/A
						N/A	N/A	Total PM	0.06	0.24	N/A	N/A	N/A	Solid	AP-42	N/A
533	Upward vertical stack	533	Fluid Bed	10024047	Cartridge Collector	N/A	N/A	PM-10	0.06	0.24	N/A	N/A	N/A	AP-42	N/A	
						N/A	N/A	SO ₂	0.004	0.015	N/A	N/A	N/A	Gas	AP-42	N/A
						N/A	N/A	PM	0.6	1.49	0.04	0.09	Solid; Particulate	EE	N/A	

ATTACHMENT J – EMISSION POINTS DATA SUMMARY SHEET

244	Upward vertical stack	244	Coating Pan	TBD	Cartridge Collector	N/A	N/A	PM	16.88	41.78	0.84	6.25 is current limit in R13-2068R and Title V for Emission Units 215, 241, 242, 244, 245 and 246	Solid; Particulate	MB	N/A
				10008085	Regenerative Thermal Oxidizer (RTO)	N/A	N/A	VOCs	396.9	5.0 tons/yr is current Coating Pan limit in R13-2068R and Title V	7.94	5.0 tons/yr is current Coating Pan limit in R13-2068R and Title V	Gas	MB	N/A
245	Upward vertical stack	245	Coating Pan	TBD	Cartridge Collector	N/A	N/A	PM	16.88	41.78	0.84	6.25 is current limit in R13-2068R and Title V for Emission Units 215, 241, 242, 244, 245 and 246	Solid; Particulate	MB	N/A
				10008085	Regenerative Thermal Oxidizer (RTO)	N/A	N/A	VOCs	396.9	5.0 tons/yr is current Coating Pan limit in R13-2068R and Title V	7.94	5.0 tons/yr is current Coating Pan limit in R13-2068R 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

WVDEP-DAQ Revision 2/11

ATTACHMENT J – EMISSION POINTS DATA SUMMARY SHEET

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, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. **DO NOT LIST** H₂, H₂O, N₂, O₂, 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/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, 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
583	21"	70-150	Varies	Varies	~1000	~30 ft	Approx: Zone 17; 4390.5540971422205 (Lat 39.660129)	Approx: Zone 17; 589.3285978954759 (Long -79.958659)
016	16"	450 (flue gas)	2412	28.7	~1000	~16 ft	Approx: Zone 17; 4390.5540971422205 (Lat 39.660129)	Approx: Zone 17; 589.3285978954759 (Long -79.958659)
533	21"	70-150	Varies	Varies	~1000	~30 ft	Approx: Zone 17; 4390.5540971422205 (Lat 39.660129)	Approx: Zone 17; 589.3285978954759 (Long -79.958659)
244	N/A	45°C – 80°C	4000 CFM	N/A	~1000	~30 ft	Approx: Zone 17; 4390.5540971422205 (Lat 39.660129)	Approx: Zone 17; 589.3285978954759 (Long -79.958659)
245	N/A	45°C - 80°C	4000 CFM	N/A	~1000	~30 ft	Approx: Zone 17; 4390.5540971422205 (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
AND
TITLE V PERMIT REVISION

Attachment L

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

Attachment L
EMISSIONS UNIT DATA SHEET
GENERAL

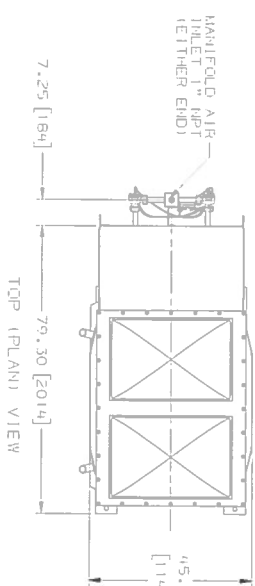
To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*): 583

<p>1. Name or type and model of proposed affected source:</p> <p>Fluid Bed (TBD) manufactured by Vector Corporation (EP ID 583).</p>
<p>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.</p>
<p>3. Name(s) and maximum amount of proposed process material(s) charged per hour:</p> <p>Dry powder raw pharmaceutical materials will be mixed, compounded, and formulated in quantities of approximately 575 kg per load for a 300 fluid bed model FL-N-300 (EP ID 583). Certain products may be mixed with aqueous solutions.</p>
<p>4. Name(s) and maximum amount of proposed material(s) produced per hour:</p> <p>Dry granulated pharmaceutical materials will be produced in quantities of approximately 575 kg per hour for fluid bed size 300 (583) on average.</p>
<p>5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:</p> <p>None</p>

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

THIS DOCUMENT CONTAINS INFORMATION THAT IS CONFIDENTIAL, UNCLASSIFIED, AND NOT BE LOANED, REPRODUCED, COPIED, IN ANY MANNER, OR DISCLOSED TO OTHERS WITHOUT THE WRITTEN AUTHORIZATION OF CHARA. THE INFORMATION CONTAINED HEREIN IS THE PROPERTY OF CHARA AND IS NOT TO BE REPRODUCED OR DISCLOSED IN ANY MANNER WITHOUT THE WRITTEN AUTHORIZATION OF CHARA. IF YOU ARE AN EMPLOYEE OF CHARA, YOU AGREE TO HOLD CHARA HARMLESS FROM A REPRISAL FROM ANY OTHER EMPLOYER.



APPROVAL PRINT

DATE SENT: 06/02/2016

APPROVED AS NOTED

NOT APPROVED

APPROVER SIGNATURE: _____

APPROVER PRINTED NAME: _____

DATE: _____

RETURN ONE SIGNED COPY TO: _____

PROPERTY OF: DONALDSON COMPANY, INC.

SPECIFICATIONS FOR DFO 3-12

- REMOTE THERM: 120 VAC 50-90 HZ
- NUMBER OF FILTERS: 12 ULTRA-WEB GALV
- ACTUAL FILTER AREA: 2,280.50 FT² (211.8 sq m)
- PERFECT TIGHT VALVE REGISTRATION: 14 BAR
- NUMBER OF VALVES: 180 DEGREE F (82° C) MAX
- COMPRESSED AIR REQUIRED: 10 SCFM @ 90-100 PSIG
- HOUSING RATING: 11.7 m³/hr @ 6-7 bar
- FINISH: 20" WC (-508 mmwg)
- APPROXIMATE WEIGHT: NATIONAL BLUE
- APPROXIMATE WEIGHT: 2,850 LBS (11202 kg)

IBC 2012 SPECIFICATIONS

RISK CATEGORY 11

BASIC WIND SPEED & EXPOSURE: 115 MPH (195 km/hr)

SEISMIC SPECTRAL ACCELERATION: Exposure C, 3 sec gust

GROUND SNOW LOAD: 10 psf (480 PSF)

ROOF LIVE LOAD: 20 psf (98 kg/m²)

COLLECTOR BASE: 4" GRADE

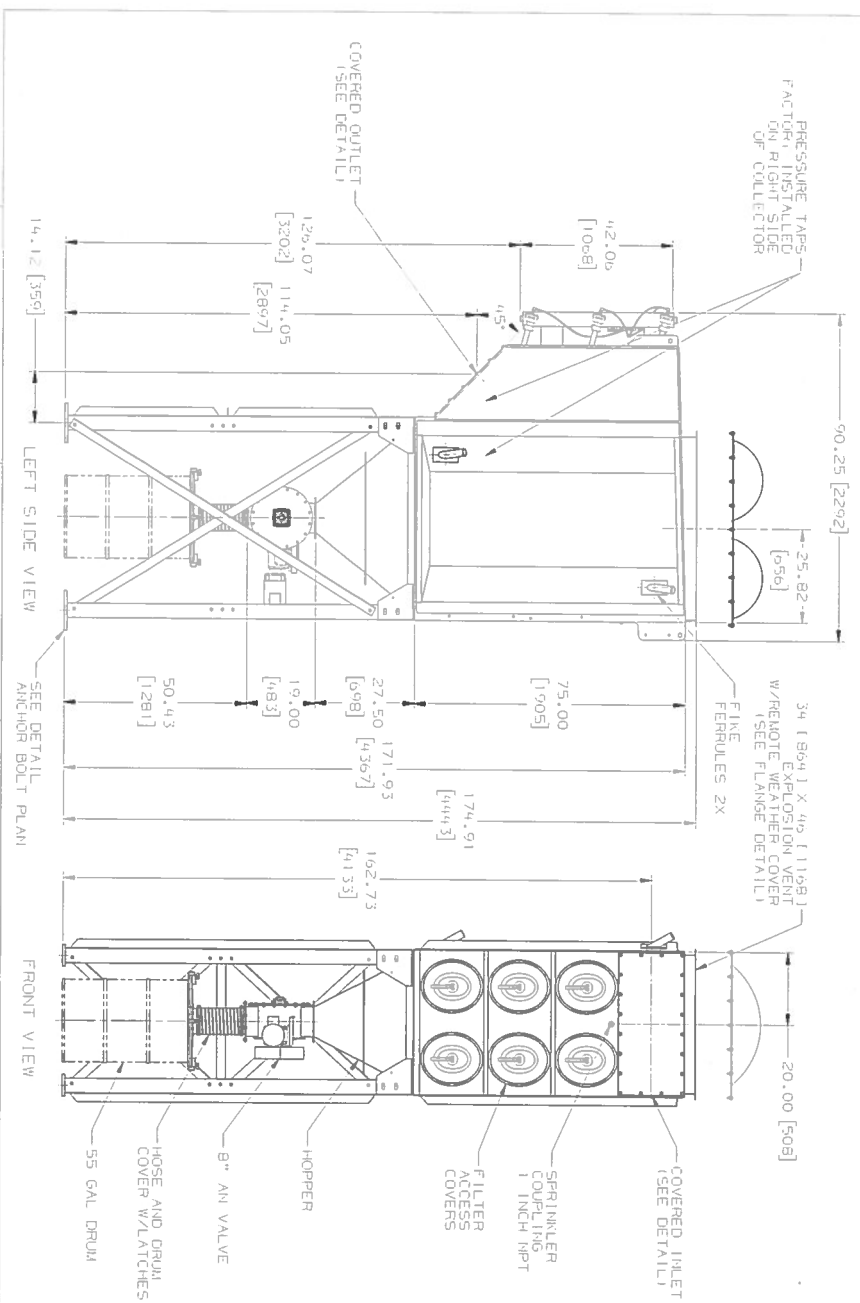
EXPLOSION VENT

DONALDSON MEDIATEK[®] X 47 (184 x 1194)

NOMINAL SIZE: 36" (914 mm)

RELIEF AREA (TOP VENT): 7,599 FT²

NOMINAL BURST PRESSURE: 1.45 psig (0.1 bar)



NOTES:

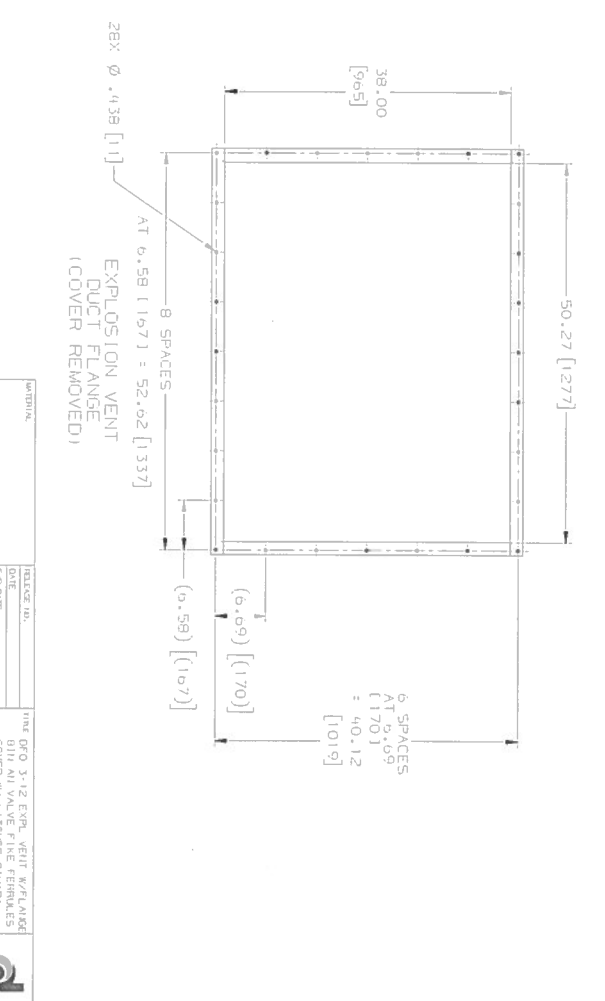
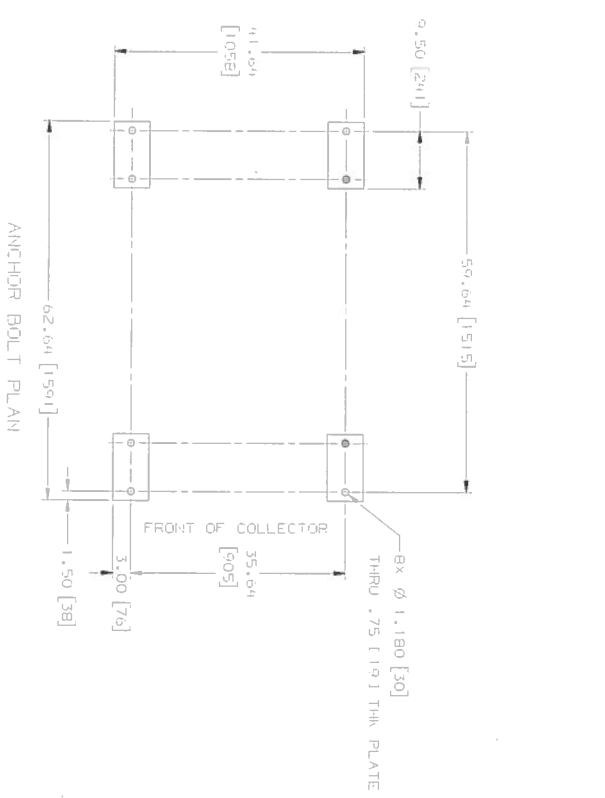
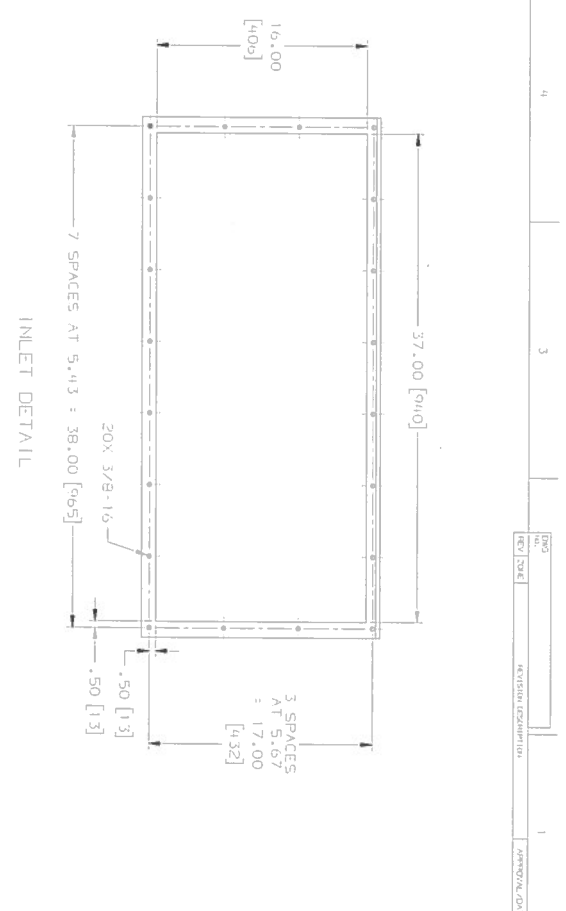
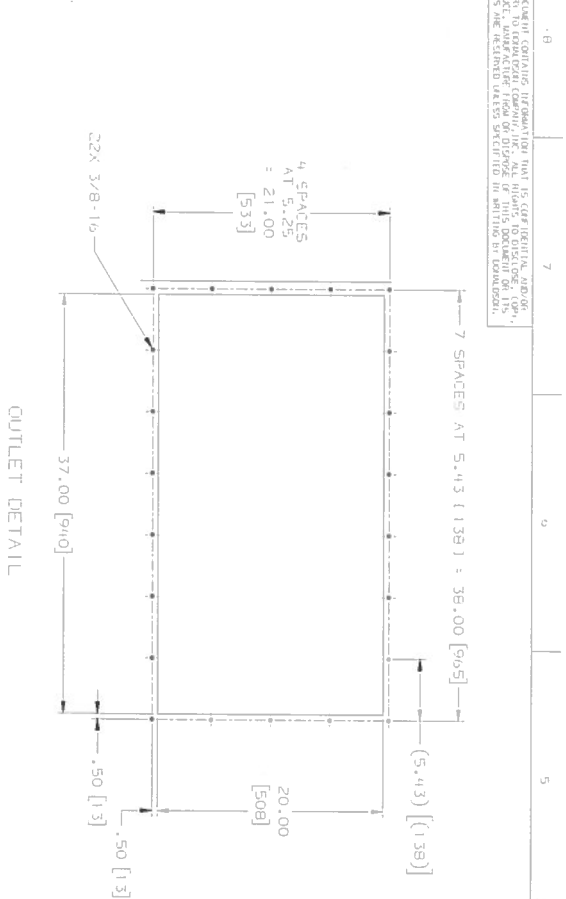
1. THE SOLENOID ENCLOSURE IS RATED NEMA 7.
2. THIS COLLECTOR INCLUDES GROUND TEST DOCUMENTATION.
3. THE FOLLOWING RATING APPLIES TO THIS DUST CONFIGURATION. KEEPERS OF EXPLOSION VENT FIDUC: MAX DUCT LENGTH: 38 INCH. IF COLLECTOR IS USED OUTDOORS, WITH NO DUCT LENGTH: MAX: 495 bar-m/s and Pmax: 12 bar.

CHARA

REVISION NO.	DATE	DESCRIPTION
01	JAN 21 2016	REVISED TO 12" EXPL. VENT W/FLANGE
02	JUN 01 2016	REVISED TO 14" EXPL. VENT W/FLANGE
03	JUN 01 2016	REVISED TO 18" EXPL. VENT W/FLANGE

PROJECT NO.	1610961297L001
CLIENT	CHARA
DESIGNER	CHARA
CHECKER	CHARA
DATE	06/02/2016
SCALE	AS SHOWN
APPROVED	[Signature]

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ANCHOR BOLTS, BY OTHERS, FINAL SELECTION WILL DEPEND ON JOBSITE LOAD CONDITIONS, FOUNDATION DESIGN, LOCAL CODES, ETC. CONSULT PRODUCT DATA FOR GENERAL INSTALLATION INFORMATION.

REVISION	DATE	BY	DESCRIPTION
1	01/01/2010	DH J. SEVENS	ISSUE FOR FABRICATION
2	01/01/2010	DR T. ROSEL	REVISED TO ADD ANCHOR BOLTS
3	01/01/2010	DR T. ROSEL	REVISED TO ADD EXPLOSION VENT DUCT FLANGE

PROJECT	1610961297L001
SCALE	1/8" = 1'-0"
DATE	01/01/2010
BY	DH J. SEVENS
CHECKED	DR T. ROSEL
APPROVED	DR T. ROSEL

NO.	DATE	BY	DESCRIPTION
1	01/01/2010	DH J. SEVENS	ISSUE FOR FABRICATION
2	01/01/2010	DR T. ROSEL	REVISED TO ADD ANCHOR BOLTS
3	01/01/2010	DR T. ROSEL	REVISED TO ADD EXPLOSION VENT DUCT FLANGE



Donaldson
Engineering, Inc.
1 AF

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Attachment N

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

ATTACHMENT N – SUPPORTING EMISSIONS CALCULATIONS

The attached spreadsheets contain the estimated maximum hourly and annual emission rates for the new fluid bed and associated dust collector, the existing fluid bed and replacement dust collector, the boiler and the existing coating pans and the associated replacement dust collectors.

1. A new fluid bed is being installed due to new product forecasts and production requirements. The fluid bed will be capable of drying aqueous based granulations of pharmaceutical ingredients. The associated dust collector will be installed to capture particulate emissions from air drying and system exhaust.
2. A new 6.0 MMBtu/hr. boiler will be installed as a backup to existing boilers in the vicinity and will service the humidification needs of air handling equipment and provide process steams for coating pan applications.
3. A new cartridge type dust collector has been installed to replace the existing dust collector on the existing fluid bed #527.
4. Two new cartridge type dust collectors will be installed to replace the existing dust collectors on coating pans #7552 and #8421. The coating pans will remain connected to the Regenerative Thermal Oxidizer (RTO) system to control VOC emissions.

Plant: Mylan Pharmaceuticals Inc. - Morgantown, WV (WVDAQ ID# 06100033)
 Reason for Application: New Fluid Bed and Replacement Dust Collector
 Process/Equipment Affected: Additional Fluid Bed (EP ID 583) and existing Fluid Bed (EP ID 533)

Emission Unit 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]	MAXIMUM EMISSIONS		
											Each Fluid Bed Hourly Rate (lb/hr)	Each Fluid Bed Hours Oper. (hr/yr)	Each Fluid Bed Annual Rate (ton/yr)
583, 533	Fluid Beds (with integral bag-type filters) during processing of noVOC raw materials	575 lb/hr dry raw materials	583, 533	P	Baghouse	10024247 10024040	95	Total PM	N	MB	0.04	4,950.00	0.09
BASIS FOR EMISSION ESTIMATES:													
1. PARTICULATE MATTER													
a. Integral bag-type filters remove 99.95% of total PM.													
b. Maximum dry raw material feed rate to fluid beds is 575 lb/hr.													
c. Max. PM emitted = $575 \text{ lb/hr} \cdot (1 - 0.9995) = 0.29 \text{ lb/hr}$.													
d. Apply Process Upset/Excursion Factor: $0.25 \text{ lb/hr} \cdot 2.4 = 0.7 \text{ lb/hr}$													
e. Max. Annual Operating Time = 4950 hr/yr for each fluid bed.													
f. R&D usage of fluid beds adds negligible PM emissions.													
g. Donaldson baghouses remove 95% of total PM.													

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

**REGULATION 13 PERMIT APPLICATION
CALCULATIONS WORKSHEET**

Plant: Mylan Pharmaceuticals Inc - Morgantown, WV
Reason for Application: Install new equipment
Process/Area: Boiler

Vent/ Stack ID No.	Emission Unit ID No.	Emission Unit Description	Total Design Capacity	Type of Release [1]	Control System	Control System ID No.	Control System Efficiency (%)	Pollutant	Emission Estimate Basis [2]	Emission Factor	Emission Factor Units	PROPOSED MAXIMUM EMISSIONS (Per Boiler)		
												Maximum Hourly Emiss. Rate (lb/hr)	Maximum Hours of Operation (hr/yr)	Maximum Annual Emiss. Rate (ton/yr)
016	016	One new Boiler (natural gas-fired only)	6.0 max. MMBtu/hr	P	None	NA	NA	NOx CO VOC Total PM PM-10 SO2	EF EF EF EF EF EF	100 0.194 0.010 9.50 9.50 0.6	lb/mmcf lb/MMBtu lb/MMBtu lb/mmcf lb/mmcf lb/mmcf	0.59 1.16 0.06 0.06 0.06 0.004	8,760	2.59 5.10 0.26 0.24 0.24 0.015
BASIS FOR EMISSION ESTIMATES:														
1. NATURAL GAS COMBUSTION EMISSIONS														
a. Natural gas combustion emission factors (lb/mmcf) are based upon AP-42 Natural Gas Combustion Table 1.4-1 [Small Boilers (<100 uncontrolled)] (Rev. 7/98) for NOx, and Table 1.4-2 for PM(Total), PM-10 and SO2. Note that the AP-42 emission factors for PM and PM-10 have been increased by 25% due to uncertainty associated with AP-42 Emission Factor Ratings less than "B".														
b. Natural gas combustion emission factor (lb/MMBtu) is based upon boiler manufacturer's emissions data for CO and VOC.														
c. Natural gas combustion emissions are based upon maximum natural gas firing rate of the proposed boilers.														
2. MAX. HOURS OF OPERATION														
a. Based upon 24 hr/day, 7 days/wk, and 52 wk/yr.														

NOTES:

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

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

Reason for Application: Replacement Dust Collectors

Process/Equipment Affected: Existing Coating Pans EP ID 244 and 245

Emission Unit 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]	MAXIMUM EMISSIONS			
											Hourly Rate without Control Device (lb/hr)	Hourly Rate with Control Device (lb/hr)	Hours Oper. (hr/yr)	Annual Rate (ton/yr)
244, 245	Coating Pan - Particulate Matter	750 lb/hr dry raw materials	244, 245	P	Baghouse	TBD	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	244, 245	P	None; VOCs emitted to atmosphere	N/A	N/A	N/A	N	MB	396.9	N/A	varies	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	244, 245	P	RTO for VOC Destruction	RTO 10008085	98%	0.98	N	MB	396.9	7.94		

BASIS FOR EMISSION ESTIMATES:

- d. Maximum coating pan load is 750 lb.
- e. Material Loss = $750 \text{ lb/hr} \cdot 1.5\% \cdot 1.5 = 16.88 \text{ lb/hr}$
- 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 = $3 \text{ kg/min} \cdot 60 \text{ min/hr} \cdot 2.205 \text{ lb/kg} = 396.9 \text{ lb/hr}$
- d. Uncontrolled Hourly limit = 396.9 lb/hr

VOC Emissions Controlled by RTO

- e. RTO control efficiency: 98% (per Permit R13-2068R)
- f. RTO Controlled Hourly Limit = $396.9 \text{ lb/hr} \cdot (1-0.98) = 7.94 \text{ lb/hr}$

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

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

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Attachment P

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

ATTACHMENT P – PUBLIC NOTICE

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

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

AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that Mylan Pharmaceuticals Inc. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Rule 13 Permit for the construction and operation of new pharmaceutical processing equipment and a new boiler for the 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 has estimated that the operations covered by said permit application have been determined to have the potential to discharge into the atmosphere annually, the following Regulated Air Pollutants and associated amounts: 2.58 tons of Nitrogen Oxides; 5.10 tons of Carbon Monoxide; 0.015 tons of Sulfur Dioxide; 0.26 tons of Volatile Organic Compounds; 0.33 tons of particulate emissions.

Startup of operations are planned to begin on or about the 22nd day of August, 2016. 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 7th day of July, 2016.

By: Mylan Pharmaceuticals Inc.
Scott Denicourt
Head of Morgantown Operations
P.O. Box 4310
Morgantown, WV 26504-43101

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Attachment S

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

Attachment S
Title V Permit Revision Information

1. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)
<p>⁽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:</p> <p>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.</p>	

2. Non Applicability Determinations
<p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p> <p>The regulatory discussion outlining non-applicable air quality requirements are contained in Attachment D of this permit application.</p>
<input type="checkbox"/> Permit Shield Requested (not applicable to Minor Modifications)
<i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i>
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
R13-2068R	11/03/2015	
R30-06100033-2012 MM04	03/22/2016	
	/ /	

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	+0.33 tpy
VOCs	+0.26 tpy
NOx	+2.58
CO	5.10
SO2	0.015

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:	07 / 07 / 2016 (Please use blue ink)
Named (typed):	John Sylvester	Title:	Head of Manufacturing Operations

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

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

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

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Appendix 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



R13-2068S

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: November 3, 2015

This permit will supersede and replace Permit R13-2068 ~~RQ~~ issued on ~~September-November 3, 2015~~.

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 ~~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
<u>016</u>	<u>016</u>	<u>Boiler TBD: Natural Gas Boiler</u>	<u>2016</u>	<u>6.0 MMBtu/hr</u>	<u>None</u>
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

Form

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 <u>10024047</u> 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

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device ⁽¹⁾
537	537	Fluid Bed 1552	1997	Up to 575 Kg/Load	CC EF1552
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
583	583	Fluid Bed TBD	2016	Up to 575 Kg/Load	CC 10024247
215	215	Coating Pan 1390	1999	750 lbs/load	CC EF1390
241	241	Coating Pan 4549	2009	750 lbs/load	CC EF4553
242	242	Coating Pan 4027	2008	245 lbs/load	CC EF4101
244	244, 10008085 ⁽²⁾	Coating Pan 7552	2010	750 lbs/load	CC EF7674TB D ; RTO

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device ⁽¹⁾
245	245, 10008085 ⁽²⁾	Coating Pan 8421	2010	750 lbs/load	CC 8422TBD ; RTO
246	246, 10008085 ⁽²⁾	Coating Pan 23581246	2015	750 lbs/load	CC 23583246 ; RTO
260	260, 10008085 ⁽²⁾	Oven 19	<1973	Electric, Load Varies	RTO
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

2.0 (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.

Form
single,

~~3.02.0~~ ~~2.0.~~ **General Conditions**

Form
single

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	PM₁₀	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	Ppmv 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	SO₂	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.

Forma

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4.03.0 ~~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.

Form

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.

~~5.04.0~~ ~~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.

~~6.05.0~~ 5.0. **Source-Specific Requirements [Boilers 007, 008, 010, 011, 012, & 013 & 016]**

5.1. Limitations and Standards

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

Table 5.1.3.: Fuel Burning Unit 45CSR2 PM Limits

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

Compliance with 45CSR§2-4.1.b shall be demonstrated through compliance with the more stringent particulate emission limit for Boiler 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 SO₂ 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 010 Emission Limits

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
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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. [Maximum emissions to the atmosphere from Emission Point ID# 016 \(6 MMBtu/hr Bryan Steam Corporation Boiler\) shall not exceed the following limits:](#)

Table 5.1.8.: Boiler TBD Emission Limits

<u>Pollutant</u>	<u>Maximum Hourly Emissions (lb/hr)</u>	<u>Maximum Annual Emissions (tpy)</u>
<u>CO</u>	<u>1.16</u>	<u>5.10</u>
<u>NO_x</u>	<u>0.59</u>	<u>2.58</u>
<u>PM_{2.5}/PM₁₀/PM⁽¹⁾</u>	<u>0.06</u>	<u>0.24</u>
<u>SO₂</u>	<u>0.004</u>	<u>0.015</u>
<u>VOCs</u>	<u>0.06</u>	<u>0.26</u>

(1) Including Condensables

5.1.9 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 5.1.98.: 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

5.1.109. [The maximum amount of natural gas to be burned by a single boiler, TBD \(Emission Point ID# 016\) shall not exceed 6000 cubic feet /hour or 52,600,000 cubic feet/year.](#)

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

- 5.1.1 20. 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~~ & 016)
- 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~~ & 016.
- 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~~ & 016.

5.3. Testing Requirements

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

5.4. Recordkeeping Requirements

- 5.4.1. To demonstrate compliance with the emission limits and natural gas usage limits for the boilers, the permittee shall record for each boiler, the monthly hours of operation and the monthly fuel consumption. (007, 008, 010, 011, 012, 013, 016)
- 5.4.2. A record of each visible emission check shall be maintained on site for five (5) years from the record creation date. Such record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what actions(s), if any, was/were taken, and the name of the observer. (007, 008, 010, 011, 012, ~~& 013~~ 016)

5.5. Reporting Requirements

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

6.0. Source-Specific Requirements [Fluid Beds 533, 534, 535, 536, 537, 538, 571, 572, ~~573~~, 574, 575, 576, 577, 578, 579, 580, 581, ~~& 582~~ & 583]

6.0

6.1. Limitations and Standards

~~7.0~~

8.0

- 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)
<u>Size 60</u> 534, 536, 538, 572, 574, 575, 577, 581	0.46
<u>Size 300</u> 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, <u>583</u>	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}/PM₁₀/PM) to the atmosphere from each Fluid Bed shall not exceed 0.1 lb/hr and 0.1 tons/year.
- 6.1.4. Maximum hourly volatile organic compound emissions to the atmosphere from the Fluid Beds shall not exceed:
- a. 529.2 lb/hr for each fluid bed (except EP ID 583) if not venting exhaust to the RTO or absorber for the purpose of controlling VOC emissions;
 - b. 10.59 lb/hr (as emitted from the RTO) each for Fluid Beds 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, 583: 575 kg/load
 - b. The annual aggregate dry material loading of all fluid beds shall not exceed 99,000,000 pounds on a rolling yearly total basis;
 - c. Cartridge collectors shall be used at all times on each fluid bed to control particulate matter emissions. Each collector shall, at a minimum, achieve a collection efficiency of 95%;
 - d. The spray rate used in each fluid bed shall not exceed 4 kilograms-VOC/minute;
 - e. Fluid Beds 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

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

6.2. Monitoring Requirements

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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.

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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.

11.0 6.5. Reporting Requirements

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

7.0. Source-Specific Requirements [Production Rooms]

12.0 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

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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

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- 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}/PM₁₀/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.

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8.2. Monitoring Requirements

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

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

- 8.2.2 For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 8.1.6(c), the permittee shall

- d. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all 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:

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

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

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

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

[45CSR§6-4.1]

- 9.1.2. The permittee shall not cause or allow emission of smoke into the atmosphere from the RTO which is twenty percent (20%) opacity or greater. The provisions of 45CSR§6-4.3 shall not apply to smoke which is less than forty percent (40%) opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six (6) minutes in any sixty (60)-minute period for stoking operations.
[45CSR§6-4.3 and 4.4]
- 9.1.3. Maximum emissions to the atmosphere from the RTO shall not exceed the values given in the following table:

Table 9.1.3(a): RTO Emission Limits

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

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
SO ₂	0.08	0.05
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 readings in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per calendar quarter. If visible emissions are observed during a quarterly monitoring from an emission point(s), then that

emission point(s) with observed emissions or opacity shall be required to revert to monthly monitoring. Any emission point that has reverted to monthly monitoring shall be allowed to again conduct quarterly visible emissions checks only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

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

- 9.2.2. For the purposes of demonstrating compliance with maximum annual natural gas combustion rates set forth in 9.1.4(b), the permittee shall monitor and record the rolling twelve month total of natural gas combusted by the RTO.
- 9.2.3. For the purposes of demonstrating compliance with maximum solvent combustion rates set forth in 9.1.4(c), the permittee shall monitor and record the amount of solvent, in pounds, sent to the RTO from Fluid Beds 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

13.0

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

10.2. Monitoring Requirements

- 10.2.1. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 10.1.2., the permittee shall:
- Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Oven Dryers 260, 261, and 264 when each Oven Dryer is and is not venting exhaust to the RTO for the purpose of controlling VOCs; and
 - Calculate and record the monthly and rolling twelve month aggregate VOC emissions from Oven Dryers 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

Forma

- 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

Forma

- 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

Forma

- 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

Forma

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

12.0. Source-Specific Requirements [Coating Line]

Forma

12.1. Limitations and Standards

Forma

- 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. ~~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.

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Form

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

Form

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

Forma

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

12.4. Recordkeeping Requirements

Forma

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

Forma

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

Forma

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.

Signature¹ _____
(please use blue ink) Responsible Official or Authorized Representative Date

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

Telephone No. _____ Fax No. _____

- 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

Expiration: January 10, 2017 • Renewal Application Due: July 10, 2016

Permit Number: **R30-06100033-2012**
Permittee: **Mylan Pharmaceuticals Inc.**
Facility Name: **Morgantown**
Mailing Address: 781 Chestnut Ridge Road, Morgantown, WV 26505

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

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

Permit Writer: Rex Compston

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

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

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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
<u>016</u>	<u>None</u>	<u>016</u>	<u>Boiler TBD: Natural gas boiler</u>	<u>6.00 MMBtu/hr</u>	<u>2016</u>
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 <u>EF7674TBD*</u> ; RTO*	244	Coating Pan 7552	750 lb/load	2010

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/Modified
245; 10008085 ⁽²⁾	CC 8424-TBD*; RTO*	245	Coating Pan 8421	750 lb/load	2010
246 10008085 ⁽²⁾	CC 23583* 246; RTO*	246	Coating Pan 23581	750 lbs/load	2015
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	Electric, Load Varies	2013
1911; 10008085 ⁽²⁾	RTO*	1911	Coating Line 1911	10.77 lb/hr	2014
280	Rotoclone 4	Rooms 74-101 – 74-122, 74-129	Room General Exhaust	Varies	1992 (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

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/Modified
296	Rotoclone 2317*	Rooms NEX140, NEX142, NEX144, NEX146, NEX159 - NEX162	Room General Exhaust	Varies	2005
297	Rotoclone 2318*	Rooms NEX139, NEX141, NEX143, NEX145, NEX152 - NEX158, NEX163, NEX164	Room General Exhaust	Varies	2005
298	Rotoclone 2319*	Rooms NEX131 - NEX136, NEX138, NEX147, NEX148	Room General Exhaust	Varies	2005
299	Rotoclone 2320*	Rooms NEX175, NEX177, NEX179, NEX181, NEX183	Room General Exhaust	Varies	2005
300	Rotoclone 2321*	Rooms NEX176, NEX178, NEX180, NEX182, NEX186 - NEX189	Room General Exhaust	Varies	2005
305	Rotoclone 2322*	Rooms NEX231, NEX232, NEX234, NEX275-NEX283, NEX286-NEX289	Room General Exhaust	Varies	2005
306	Rotoclone 2323*	Rooms NEX211A-217A	Room General Exhaust	Varies	2005
307	Rotoclone 2324*	Rooms NEX372, NEX374, NEX376, NEX378, NEX380	Room General Exhaust	Varies	2005
308	Rotoclone 2325*	Rooms NEX349, NEX362, NEX364, NEX366, NEX368, NEX369	Room General Exhaust	Varies	2005
309	Rotoclone 2326*	Rooms NEX346, NEX355, NEX357, NEX359 - NEX361	Room General Exhaust	Varies	2005
310	Rotoclone 2327*	Rooms NEX375, NEX377, NEX379, NEX381	Room General Exhaust	Varies	2005
311	Rotoclone 2328*	Rooms NEX 216A, NEX217A, NEX535-NEX538	Room General Exhaust	Varies	2005
312	Rotoclone 2329*	Rooms NEX321 - NEX330, NEX421 - NEX430	Room General Exhaust	Varies	2005
313	Rotoclone 2330*	Rooms NEX303, NEX405 - NEX412	Room General Exhaust	Varies	2005
314	Rotoclone 2331*	Rooms NEX468, NEX469, NEX472 - NEX480	Room General Exhaust	Varies	2005

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/Modified
315	Rotoclone 2332*	Rooms NEX435 - NEX438, NEX413 - NEX416, NEX419	Room General Exhaust	Varies	2005
316	Rotoclone 2333*	Rooms NEX464 - NEX467, NEX481, NEX482, NEX484 - NEX492	Room General Exhaust	Varies	2005
317	Rotoclone 2334*	Rooms NEX305- NEX312, NEX316	Room General Exhaust	Varies	2005
318	Rotoclone 2335*	Rooms NEX445B, NEX445C, NEX445D, NEX445E, NEX445F, NEX445G	Room General Exhaust	Varies	2005
319	Rotoclone 2336*	Rooms NEX514, NEX516A-D, NEX522 -NEX524, NEX526, NEX528, NEX530, NEX535 - NEX538	Room General Exhaust	Varies	2005
320	Rotoclone 2337*	Rooms NEX503, NEX505, NEX507, NEX509, NEX511, NEX513	Room General Exhaust	Varies	2005
321	Rotoclone 2338*	Rooms NEX506, NEX508, NEX510, NEX512, NEX515	Room General Exhaust	Varies	2005
322	CC 17034*	Rooms 74-174, 74-175, 74-176, 74-177, 74-179, 74-179A, 74-180, 74-180A	Room General Exhaust	Varies	2012
533	CC 100242474+5 27*	533	Fluid Bed 527	Up to 575 Kg/Load	1991
534; 10008085 ⁽²⁾	CCEF473; RTO*	534	Fluid Bed 473	Up to 250 Kg/Load	1997
535	CC EF1339*	535	Fluid Bed 1339	Up to 575 Kg/Load	1997
536	CC EF1222*	536	Fluid Bed 1222	Up to 250 Kg/Load	1997
537	CC EF1552*	537	Fluid Bed 1552	Up to 575 Kg/Load	1997
538; 10008085 ⁽²⁾	CC EF1855; RTO*	538	Fluid Bed 1855	Up to 250 Kg/Load	2002
571	CC EF2113*	571	Fluid Bed 2113	Up to 575 Kg/Load	2004
572; 10008085 ⁽²⁾	CC EF2181; RTO*	572	Fluid Bed 2181	Up to 250 Kg/Load	2004
573; 10008538 ⁽²⁾	CC 3340*; Absorber	573	Fluid Bed 2811	Up to 575 Kg/Load	2006

Emission Point ID	Control Device	Emission Unit ID	Mylan ID & Emission Unit Description	Design Capacity	Year Installed/Modified
574; 10008085 ⁽²⁾	CC 3416; RTO*	574	Fluid Bed 3287	Up to 250 Kg/Load	2006
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; 100085383 ⁽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
583	CC 10024247*	583	Fluid Bed TBD	Up to 575 Kg/Load	2016
N/A	None	N/A	Class I or Class II CFC-containing Equipment Subject to 40 CFR Part 82 Subpart F	Varies	Varies
10008085	None	10008085	Regenerative Thermal Oxidation	16.0 mmBtu/hr 3,070 lbs/hr	2010
10008538	None	10008538	Absorber	Up to 4,000 cfm	2010
10007530	None	10007530	Kohler 100 REZG Natural Gas Fired Emergency Generator	162 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 [SR](#).

⁽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

1.2. Active R13, R14, and R19 Permits

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

Permit Number	Date of Issuance
R13-2068 SR	November 3, 2015 -TBD
G60-C035A	December 28, 2011

2.0 General Conditions

2.1. Definitions

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

2.2. Acronyms

CAAA	Clean Air Act Amendments	NSPS	New Source Performance Standards
CBI	Confidential Business Information	PM	Particulate Matter
CEM	Continuous Emission Monitor	PM₁₀	Particulate Matter less than 10µm in diameter
CES	Certified Emission Statement	pph	Pounds per Hour
C.F.R. or CFR	Code of Federal Regulations	ppm	Parts per Million
CO	Carbon Monoxide	PSD	Prevention of Significant Deterioration
C.S.R. or CSR	Codes of State Rules	psi	Pounds per Square Inch
DAQ	Division of Air Quality	SIC	Standard Industrial Classification
DEP	Department of Environmental Protection	SIP	State Implementation Plan
FOIA	Freedom of Information Act	SO₂	Sulfur Dioxide
HAP	Hazardous Air Pollutant	TAP	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	TPY	Tons per Year
HP	Horsepower	TRS	Total Reduced Sulfur
lbs/hr or lb/hr	Pounds per Hour	TSP	Total Suspended Particulate
LDAR	Leak Detection and Repair	USEPA	United States Environmental Protection Agency
m	Thousand	UTM	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	VEE	Visual Emissions Evaluation
mm	Million	VOC	Volatile Organic Compounds
mmBtu/hr	Million British Thermal Units per Hour		
mmft³/hr or mmcf/hr	Million Cubic Feet Burned per Hour		
NA or N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		

2.3. Permit Expiration and Renewal

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

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

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

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

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

2.7. Minor Permit Modifications

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

2.8. Significant Permit Modification

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

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR '30-5.9.]

2.11. Operational Flexibility

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

[45CSR§30-5.8]

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

[45CSR§30-5.8.a.]

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

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

[45CSR§30-5.8.c.]

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

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

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

[45CSR§30-5.1.i.]

2.13. Duty to Comply

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

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

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

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

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

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

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

[45CSR§30-5.1.f.2.]

2.17. Emergency

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

[45CSR§30-5.7.a.]

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

[45CSR§30-5.7.b.]

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

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

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

[45CSR§30-5.7.d.]

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

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

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

[45CSR§30-5.2.a.]

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

2.19. Duty to Provide Information

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

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

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

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

[45CSR§30-5.6.a.]

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

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

[45CSR§30-5.6.c.]

2.22. Credible Evidence

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

[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

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

[45CSR§30-5.1.e.]

2.24. Property Rights

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

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

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

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

[45CSR§30-5.1.d.]

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

[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

- [40 C.F.R. 82, Subpart F]**
- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]
- 3.1.9. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR7-5.2.]
- 3.1.10. Due to unavoidable malfunction of equipment, emissions exceeding limits set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§7-9.1.]
- 3.1.11. Facility-wide emissions to the atmosphere of Hazardous Air Pollutants (HAPs) shall not exceed or equal 9.4 tons per year of any single HAP or 24.4 tons per year of any combination of HAPs. Yearly total HAPs will be determined using a 12-month rolling total.
[45CSR13, Permit No. R13-2068 (Condition 3.1.7.)]
- 3.1.12. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment, identified with an asterisk, in Section 1.1. and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11. and Permit No. R13-2068 (Condition 4.1.1.)]

3.2. Monitoring Requirements

- 3.2.1. The facility shall monitor on a monthly and yearly basis facility-wide HAP usage. Yearly HAP calculations shall be based on a 12-month rolling total.
[45CSR13, Permit No. R13-2068 (Condition 3.2.1.)]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted

in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

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

[WV Code §§ 22-5-4(a)(14-15) and 45CSR13, R13-2068, 3.3.1]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;

- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

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

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]
- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]
- 3.4.4. **Fugitive Dust Control Systems.** The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. The permittee shall also inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of such inspections and of all scheduled and non-scheduled maintenance of such systems. These records shall be maintained on site for five (5) years from the record creation date, stating any maintenance or corrective actions taken as a result of the monthly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.
[45CSR§30-5.1.c.]
- 3.4.5. To demonstrate compliance with the facility-wide HAP limits, the permittee shall maintain monthly and yearly records of facility-wide HAP usage. The facility shall prepare monthly facility-wide calculations of the amount of each individual HAP emitted and the amount of aggregated HAPs emitted. Yearly HAP calculations shall be based on a 12-month rolling total.
[45CSR13, Permit No. R13-2068 (Condition 3.4.3.)]
- 3.4.6. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment identified with an asterisk in Section 1.1., the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, Permit No. R13-2068 (Condition 4.2.2.)]
- 3.4.7. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment identified with an asterisk in Section 1.1., the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
 - a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.

- c. The duration of the event.
- d. The estimated increase in emissions during the event.

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

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

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

3.5. Reporting Requirements

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

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 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.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

- 3.6.1. Not applicable.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- a. 45CSR27 – *To Prevent and Control the Emissions of Toxic Air Pollutants*. This rule does not apply to the facility because the facility currently does not have the potential to emit any such air pollutant in quantities equal to or greater than those set forth in this rule.
 - b. 40 C.F.R. 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984*. This subpart does not apply to the storage tanks at the facility because the tanks do not contain a petroleum liquid and the tanks have a capacity (8,200 gallons each) less than those tanks defined as an affected facility.
 - c. 40 C.F.R. 60, Subpart Kb – *Standard of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*. This subpart does not apply to the storage tanks at the facility because the tanks were installed [in 1978] prior to July 23, 1984. Additionally, the tanks have a capacity (8,200 gallons each) less those tanks defined as an affected facility.
 - d. 40 C.F.R. 63, Subpart F – *National Emissions Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry*. The facility does not manufacture any of the chemicals listed in Table I of Subpart F as a primary product.
 - e. 40 C.F.R. 63, Subpart G – *National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater*. The facility is not subject to Subpart F, therefore, it is not subject to Subpart G of Part 63.
 - f. 40 C.F.R. 63, Subpart FFFF – *National Standards for Miscellaneous Organic Chemical Manufacturing*. The facility does not emit hazardous air pollutants at major levels and is therefore not subject to this subpart.
 - g. 40 C.F.R. 63, Subpart GGG – *National Standards for Pharmaceuticals Production*. The facility does not emit hazardous air pollutants at major levels and is therefore not subject to this subpart.
 - h. 40 C.F.R. 63, Subpart DDDDD – *National Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters*. The facility is not a major source of hazardous air pollutants and is therefore not subject to this subpart.

- i. 40 C.F.R. 63, Subpart VVVVVV – *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources*. Mylan has stated that all HAP emissions are from the quality control laboratories, which are exempt from this subpart according to 40 C.F.R. § 63.11494(c)(4).
- j. 40 C.F.R. 64 - *Compliance Assurance Monitoring*. This is the second permit renewal for this facility. At the time of the first renewal, CAM was determined not to be applicable to the sources currently in use at the facility. Since the first renewal, several new pieces of equipment were installed at this facility. This equipment includes fluid beds 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560, 15982, 16117 (Emission Unit ID No. 573, 574, 575, 576, 577, 578, 579, 580, 581, and 582), coating pans 4549, 4027, 3853, 7552, 8421 (Emission Unit ID No. 241-245), the RTO (Emission Unit ID No. 10008085), the Absorber (Emission Unit ID No. 10008538), and the Emergency Generators (Emission Unit IDs No. 10007530 and 10008594). The RTO and absorber serve as the control devices for the fluid beds, coating pans, and ovens (as applicable). The PTE of any unit being routed to a control device for that pollutant is less than 100 TPY, therefore CAM still does not apply.
- k. 45CSR§2-5.1 – The facility burns natural gas only; therefore this section of 45CSR2 does not apply.
- l. 45CSR§10-4 – The facility’s manufacturing process source operations do not emit sulfur dioxide with the exception of trace amounts from natural gas combustion.
- m. 45CSR§10-5 & 45CSR§10-8 – The facility’s boilers burn only natural gas; therefore, they are exempt from the requirements of these sections of 45CSR10.
- n. 45CSR10A – *Testing, Monitoring, Recordkeeping and Reporting Requirements Under 45CSR10*. The facility’s boilers combust natural gas only; therefore, the facility is exempt from the requirements of this rule.

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

4.1. Limitations and Standards

4.1.1 No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six-minute block average. [45CSR§2-3.1 and 45CSR13, Permit No. R13-2068 (Condition 5.1.1.)]

4.1.2. Compliance with the visible emission requirements of 45CSR2, subsection 3.1 (4.1.1.), shall be determined in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of 4.1.1. Continuous opacity monitors shall not be required on fuel burning units, which employ wet scrubbing systems for emission control. [45CSR§2-3.2 and 45CSR13, R13-2068 (Condition 5.1.2.)]

~~4.1.3. The maximum amount of natural gas to be burned by a single boiler 7, 8, 15 (Emission Unit IDs 007, 008, 010) shall not exceed 7,000 ft³/hr or 61,320,000 ft³/yr. [45CSR13, Permit No. R13-2068 (Condition 5.1.9.)] (007, 008, 010)~~

~~4.1.3. The maximum amount of natural gas to be burned by a single boiler. TBD (Emission Unit IDs 016, shall not exceed 6000 ft³/hr or 52,600,000 ft³/yr. [45CSR13, Permit No. R13-2068 (Condition 5.1.9.)] (007/016, 008, 010)~~

~~4.1.4. Maximum emissions from boiler TBD (Emission Unit ID 016) shall not exceed the following limits:~~

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

~~4.1.5. The maximum amount of natural gas to be burned by a single boiler 7, 8, 15 (Emission Unit IDs 007, 008, 010, shall not exceed 7,000 ft³/hr or 61,320,000 ft³/yr. [45CSR13, Permit No. R13-2068 (Condition 5.1.9.)] (007, 008, 010)~~

~~4.1.3. Maximum emissions from each boiler 7, 8, 15 (Emission Unit IDs 007, 008, 010) shall not exceed the following limits:~~

~~4.1.6. Maximum emissions from each boiler 7, 8, 15 (Emission Unit IDs 007, 008, 010) shall not exceed the following limits:~~

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
Carbon Monoxide	0.59	2.58
Nitrogen Oxides	0.70	3.07
PM _{2.5} /PM ₁₀ /PM ⁽¹⁾	0.10	0.30

Sulfur Dioxide	0.10	0.10
Volatile Organic Compounds	0.10	0.20

(1) Including Condensables

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

4.1.5. The three (3) Bryan Steam Corporation boilers 2343, 2344 & 2345 (Emission Unit IDs 011, 012, & 013) shall combust only natural gas fuel. The maximum amount of natural gas consumed by each boiler shall not exceed 20,590 ft³/hr and 180.4 million ft³/yr.

[45CSR13, Permit No. R13-2068 (Condition 5.1.10.)] (011, 012, 013)

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

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

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

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

***Includes PM_{2.5} and condensables for Boilers 2343-2345

[45CSR§2-4.1.b., 45CSR§10-3.3.f., and 45CSR13, Permit No. R13-2068 (Conditions 5.1.3., 5.1.4., and 5.1.8.)] (011, 012, 013)

4.2. Monitoring Requirements

4.2.1. The facility shall monitor the amount of natural gas used and the hours of operation for Boilers 7, 8, 15, 2343, 2344 and 2345 (Emission Unit IDs 007, 008, 010, 011, 012, and 013) on a monthly and yearly basis. To demonstrate compliance with the emission limits and natural gas usage limits, the permittee shall record for each boiler the monthly hours of operation, and the monthly fuel consumption.

[45CSR16, 40 C.F.R. § 60.48c(g) (Subpart Dc); 45CSR13, Permit No. R13-2068 (Conditions 5.2.2., 5.2.3., and 5.4.1.)](007, 008, 010, 011, 012, and 013)

4.2.2. At such reasonable times as the Director may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with the opacity standards of 45CSR§2-3.1.

Method 9 shall be conducted in accordance with 40 C.F.R. 60, Appendix A.
[45CSR13, Permit No. R13-2068 (Condition 5.2.1.)]

4.3. Testing Requirements

4.3.1. Reserved.

4.4. Recordkeeping Requirements

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

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

4.5. Reporting Requirements

4.5.1. See Section 3.5 Facility - Wide Reporting Requirements

4.6. Compliance Plan

4.6.1. None

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

5.1. Limitations and Standards

- 5.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation, which is greater than twenty (20) percent opacity.
[45CSR§7-3.1 and 45CSR13, Permit No. R13-2068 (Condition 6.1.1.)]
- 5.1.2. Maximum particulate matter emissions (PM_{2.5}/PM₁₀/PM) from each Fluid Bed to the atmosphere shall not exceed 0.1 pounds per hour and 0.1 tons per year.
[45CSR § 7-4.1. and 45CSR13, Permit No. R13-2068 (Condition 6.1.3.)] *Compliance with this streamlined limit will assure compliance with 45CSR § 7-4.1. and Permit No. R13-2068 (Condition 6.1.2.)*
- 5.1.3. The fluid beds shall operate according to the following requirements:
- a. The aggregate dry material loading of the fluid bed (excluding times of tablet/beads coating in a fluid bed) shall not exceed the following limits:
 - (1) Fluid Beds 473, 1222, 1855, 2181, 3287, 3620, 3704, 15982 (Emission Unit IDs 534, 536, 538, 572, 574, 575, 577, 581): 250 kg/load
 - (2) Fluid Beds 527, 1339, 1552, 2113, 2811, 3426, 3705, 4001, 7560, 16117 (Emission Unit IDs 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, 583): 575 kg/load
 - b. The annual aggregate dry material loading of all fluid beds shall not exceed 99,000,000 pounds on a rolling yearly total basis.
 - c. Cartridge collectors shall be used at all times on each fluid bed to control particulate matter emissions. Each collector shall, at a minimum, achieve a collection efficiency of 95%.
 - d. The spray rate used in each fluid bed shall not exceed 4 kilograms-VOC/minute.
 - e. Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) shall have the capability of directing exhaust to the RTO for control of VOCs or emitting directly to atmosphere.
 - f. Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) shall have the capability of directing exhaust to the absorber for control of VOCs or emitting directly to atmosphere.
 - g. No HAP-containing solvents shall be processed in any fluid bed.
- [45CSR13, Permit No. R13-2068 (Condition 6.1.6.)]
- 5.1.4. Maximum hourly VOC emissions to the atmosphere from the Fluid Beds shall not exceed:
- a. 529.2 lb/hr for each fluid bed (except 583) if not venting exhaust to the RTO for the purpose of controlling VOC emissions.
 - b. 10.59 lb/hr (as emitted from the RTO) each for Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) if venting exhaust to the RTO

for the purpose of controlling VOC emissions. When exhausting to the RTO, fluid bed emissions shall be placed on the RTO emission point.

- c. 26.46 lb/hr (as emitted from the absorber) each for Fluid Bed 2811 and 4001 (Emission Unit IDs 573 and 579) if venting exhaust to the absorber for the purpose of controlling VOC emissions. When exhausting to the absorber, fluid bed emissions shall be placed on the absorber emission point.

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

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

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

5.2. Monitoring Requirements

- 5.2.1. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 5.1.3.c, the permittee shall:

- a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all 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 6.2.2.)]

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

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

[45CSR13, Permit No. R13-2068 (Conditions 6.2.1.)]

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

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

5.3. Testing Requirements

- 5.3.1. See Section 3.3.1.

5.4. Recordkeeping Requirements

- 5.4.1. The permittee shall maintain a record of all solvents used in the fluid beds and keep a copy of the associated MSDS/SDS to verify that the solvents did not contain any constituent HAPs.
[45CSR13, Permit No. R13-2068 (Condition 6.4.2.)]
- 5.4.2. Records of weekly inspections conducted on the cartridge collector shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
[45CSR13, Permit No. R13-2068 (Condition 6.4.1.)]

5.5. Reporting Requirements

- 5.5.1. See Section 3.5 Facility - Wide Reporting Requirements

5.6. Compliance Plan

- 5.6.1. None.

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

6.1. Limitations and Standards

- 6.1.1. No person shall cause, suffer, allow or permit emission of smoke and /or particulate matter into the open air from any process source operation, which is greater than twenty (20) percent opacity.
 [45CSR§7-3.1. and 45CSR13, Permit No. R13-2068 (Condition 7.1.1.)] *(All units listed above)*
- 6.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified for each of the following emission points (under the appropriate source operation type in Table 45-7A found at the end of 45CSR7:

Emission Point	PM Emission Limit (lb/hr)
280, 281, 283	1.20 ⁽¹⁾
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 for emission points 287, 288, 291, 294, 295, 282, 296-300, and 305-323 shall be demonstrated through compliance with the more stringent particulate emission limit set forth in 6.1.3 and 6.1.5.

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

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

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

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

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

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

- 6.1.5. Maximum particulate matter (PM) emissions to the atmosphere from Emission Points 282, 296-300, and

305-323, 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).
[45CSR§7-4.1. and 45CSR13, Permit No. R13-2068 (Condition 7.1.6.)] *Compliance with this streamlined limit will assure compliance with 45CSR§7-4.1. and Permit R13-2068 (Condition 7.1.2.).*

- 6.1.6. The Rotoclone control devices and cartridge collector servicing production rooms shall be designed to achieve a collection efficiency of 98% for particulate matter emissions.
[45CSR13, Permit No. R13-2068 (Condition 7.1.4.)]
- 6.1.7. The permittee shall maintain and operate low water supply pressure sensors with control panel alarms for each Rotoclone to ensure adequate water supply and flow rate to the Rotoclones at each emission point specified, in order to ensure proper operation of the Rotoclone.
[45CSR13, Permit No. R13-2068 (Condition 7.1.7.)]

6.2. Monitoring Requirements

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

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

[45CSR13, Permit No. R13-2068 (Conditions 7.2.1.)]

- 6.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 6.1.6, the permittee shall:
- Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacturer's recommendations concerning control device maintenance and performance;
 - Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and
 - Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 98%.

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

6.3. Testing Requirements

- 6.3.1. See Section 3.3.1.

6.4. Recordkeeping Requirements

- 6.4.1. A record of each visible emission check shall be maintained on site for five (5) years from the record creation date. Such record shall include the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer. [45CSR13, Permit No. R13-2068 (Condition 7.4.1.)]
- 6.4.2. Records of Rotoclone low water supply pressure sensor alarm shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each Rotoclone low water supply pressure sensor alarm. [45CSR13, Permit No. R13-2068 (Condition 7.4.2.)]

6.5. Reporting Requirements

- 6.5.1. See Section 3.5 Facility - Wide Reporting Requirements

6.6. Compliance Plan

- 6.6.1. None

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

7.1. Limitations and Standards

- 7.1.1 No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation, which is greater than twenty (20) percent opacity.
[45CSR§7-3.1. and 45CSR13, Permit No. R13-2068 Condition 8.1.1.)]
- 7.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7. Based on the process weight rates for the Coating Pans (excluding Coating Pans 1390, 4549, 4027, 3853, 7552, 8421 and 23581; Emission Unit ID No. 215, 241, 242, 243, 244, 245 and 246), 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 3853 (Emission Unit ID 243), 750 pounds per hour, the corresponding allowable particulate matter emission rate is 0.9 pounds per hour.
[45CSR§7-4.1] (Coating Pans 169, 186, 217, 99, 3853; Emission Unit IDs 210, 220, 230, 240, 243)
- 7.1.3. Particulate matter emissions from the Coating Pan, venting through a cartridge collector (Coating Pans 1390, 4549, 4027, 7552, 8421 and 23581; Emission Unit IDs 215, 241, 242, 244, 245, 246) at Emission Point ID No. 215, 241, 242, 244, 245, and 246 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
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 and 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 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) if venting exhaust to the RTO for the purpose of controlling VOC emissions.

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

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

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

- 7.1.6. The coating pans shall operate according to the following requirements:
- a. The aggregate dry material loading of each coating pan shall not exceed the following values:
 - (1) Coating Pan 1390 (Emission Unit IDs 215): 750 pound/load;
 - (2) Coating Pan 4549 (Emission Unit IDs 241): 750 pound/load;
 - (3) Coating Pan 4027 (Emission Unit IDs 242): 245 pound/load;
 - (4) Coating Pan 7552 (Emission Unit IDs 244): 750 pound/load;
 - (5) Coating Pan 8421 (Emission Unit IDs 245): 750 pound/load; and
 - (6) Coating Pan 23581 (Emission Unit IDs 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 4549, 4027, 7552, 8421 and 23581 (Emission Unit IDs 241, 242, 244, 245 and 246) shall not exceed 3,000 grams-VOC/minute in each coating pan.
 - e. No VOC-containing solvents shall be processed in coating pan 1390 (Emission Unit IDs 215).
 - f. Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere.
 - g. No HAP-containing solvents shall be processed in any coating pan.
[45CSR13, Permit No. R13-2068 (Condition 8.1.6.)]

7.2. Monitoring Requirements

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

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval 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 manufacturer's recommendations concerning control device maintenance and performance.

- b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
 - c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.
[45CSR13, Permit No. R13-2068 (Condition 8.2.2.)]
- 7.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 7.1.6.a., the permittee shall monitor and record the total dry material per load for each coating pan. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each coating pan is equal or less than the maximum load given under 7.1.6.a. or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 7.1.6.a.
[45CSR13, Permit No. R13-2068 (Condition 8.2.3.)]
- 7.2.4. For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 7.1.6.b., the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material loaded into the coating pans.
[45CSR13, Permit No. R13-2068 (Condition 8.2.4.)]
- 7.2.5. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 7.1.5, the permittee shall:
- a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246).
 - b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) when each coating pan is and is not venting exhaust to the RTO for the purpose of controlling VOCs.
 - c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all coating pans by summing the following:
 - (1) The total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246).
 - (2) The total amount of VOCs in pounds used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) when not venting exhaust to the RTO for the purpose of controlling VOCs.
 - (3) The total amount of VOCs used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246) when venting exhaust to the RTO for the purpose of controlling VOCs.
- [45CSR13, Permit No. R13-2068 (Condition 8.2.5.)]**

7.3. Testing Requirements

- 7.3.1. See Section 3.3.1.

7.4. Recordkeeping Requirements

- 7.4.1. Records of weekly inspections conducted on the cartridge collector shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
[45CSR13, Permit No. R13-2068 (Condition 8.4.1.)]
- 7.4.2. The permittee shall maintain a record of all solvents used in the coating pans and keep a copy of the associated MSDS/SDS to verify that the solvents did not contain any constituent HAPs.
[45CSR13, Permit No. R13-2068 (Condition 8.4.2.)]

7.5. Reporting Requirements

- 7.5.1. See Section 3.5 Facility - Wide Reporting Requirements

7.6. Compliance Plan

- 7.6.1. None

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

8.1. Limitations and Standards

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

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

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

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

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

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

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

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

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

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	28.76	10.44
NO _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
VOCs	61.49	6.59

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

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

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

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

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

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

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

a. Minimum RTO Combustion Chamber Temperature; and

b. RTO Exhaust Flow Rate.

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

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

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

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

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

8.2. Monitoring Requirements

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

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

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval 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 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line. The monthly and rolling twelve month total of solvent sent to RTO from Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421 and 23581 (Emission Unit IDs 244, 245 and 246); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line shall be summed and recorded.

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

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

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

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

- 8.2.5. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all 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.)]

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

8.4. Recordkeeping Requirements

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

8.5. Reporting Requirements

- 8.5.1. See Section 3.5 Facility - Wide Reporting Requirements

8.6. Compliance Plan

- 8.6.1. None

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

9.1 Limitations and Standards

- 9.1.1. Only pipeline quality natural gas shall be burned in Emergency Generators 10007530 and 10008594. [45CSR13, Permit No. G60-C035]
- 9.1.2. Maximum emissions to the atmosphere for each Emergency Generators 10007530 and 10008594 shall not exceed the values given in the following table:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
Emergency Generator 10007530		
CO	1.43	0.36
NO _x	0.71	0.18
VOCs	0.36	0.09
Emergency Generator 10008594		
CO	1.43	0.36
NO _x	0.71	0.18
VOCs	0.36	0.09

[45CSR13, Permit No.-G60-C035]

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

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
CO	5.79	1.45
NO _x	10.58	2.65
VOCs	10.58	2.65

[45CSR13, Permit No. G60-C035]

- 9.1.4. Emergency Generator 1053 shall not exceed a fuel oil sulfur content of 0.05%. [45CSR13, Permit No. G60-C035]

9.2. Monitoring Requirements

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

9.3. Testing Requirements

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

9.4. Recordkeeping Requirements

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

9.5. Reporting Requirements

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

9.6. Compliance Plan

- 9.6.1. None

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

10.1 Limitations and Standards

- 10.1.1. Maximum hourly volatile organic compound (VOC) emissions to the atmosphere from Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261 and 264) shall not exceed:
- 529.2 lb/hr for each Oven Dryer if not venting exhaust to the RTO for the purpose of controlling VOC emissions.
 - 10.59 lb/hr (as emitted from the RTO) for each Oven Dryers if venting exhaust to the RTO for the purpose of controlling VOC emissions.

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

- 10.1.2. The maximum total combined annual volatile organic compound (VOC) emissions to the atmosphere from Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) shall not exceed 5.0 tons/year.
[45CSR13, Permit No. R13-2068 (Condition 10.1.2.)]

- 10.1.3. Oven Dryers 260, 261, and 264 shall operate according to the following requirements:
- Each Oven Dryers shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere; and
 - No HAP-containing solvents shall be processed in any Oven Dryer.

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

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

10.3. Testing Requirements

10.3.1. See Section 3.3.1.

10.4. Recordkeeping Requirements

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

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

10.5. Reporting Requirements

10.5.1. See Section 3.5 Facility - Wide Reporting Requirements

10.6. Compliance Plan

10.6.1. None

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

11.1. Limitations and Standards

- 11.1.1. The absorber shall, at all times when Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 95%.
[45CSR13, Permit No. R13-2068 (Condition 11.1.1.)]
- 11.1.2. The permittee shall, within 60 days of the date of the performance test required under 11.3.1, determine the optimal operating ranges of the absorber parameters listed under 11.1.2(a) so as to monitor the effective operation of the Absorber. The determination of operating ranges shall be based on data obtained from performance testing, manufacturing recommendations, or operational experience. The permittee shall maintain on-site, and update as necessary, a certified report listing the operating ranges. Any changes to the operating ranges shall be accompanied by the date of the change and reason for the change.
- a. Minimum Water Flow
[45CSR13, Permit No. R13-2068 (Condition 11.1.2.)]
- 11.1.3. The permittee shall maintain and operate low water flow rate sensors with control panel alarms for the absorber to ensure adequate water flow rate to the absorber in order to ensure proper operation of the absorber.
[45CSR13, Permit No. R13-2068 (Condition 11.1.3.)]
- 11.1.4. The permittee shall, to the extent reasonably possible, operate the absorber within the operating ranges as established under 11.1.2. at all times Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 11.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 5.2.5(c), a VOC destruction efficiency of 95% may not be assumed for the duration of the venting of VOC from Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579).
[45CSR13, Permit No. R13-2068 (Condition 11.1.4.)]
- 11.1.5. The permittee shall conduct, at a minimum, an annual inspection of the absorber to ensure proper operation of the control device. The inspection shall include the spray nozzles, fans, dampers, absorber shell, packing, and ductwork.
[45CSR13, Permit No. R13-2068 (Condition 11.1.5.)]

11.2. Monitoring Requirements

- 11.2.1. For the purposes of demonstrating compliance with the requirements set forth in 11.1.2., the permittee shall continuously monitor and record the absorber water flow rate
[45CSR13, Permit No. R13-2068 (Condition 11.2.1.)]
- 11.2.2. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all manufacture's recommendations.
[45CSR13, Permit No. R13-2068 (Condition 11.2.2.)]

11.3. Testing Requirements

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

11.4. Recordkeeping Requirements

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

11.5. Reporting Requirements

- 11.5.1. See Section 3.5 Facility - Wide Reporting Requirements

11.6. Compliance Plan

- 11.6.1. None

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

12.1. Limitations and Standards

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

12.2. Monitoring Requirements

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

12.3. Testing Requirements

- 12.3.1. See Section 3.3 Facility - Wide Testing Requirements

12.4. Recordkeeping Requirements

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

12.5. Reporting Requirements

- 12.5.1. See Section 3.5 Facility - Wide Reporting Requirements

12.6. Compliance Plan

- 12.6.1. None

Attachment A: Class II General Permit G60-C

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

Appendix 3

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

Appendix 3 – PSD Applicability Review

R14 PSD Applicability Review

Mylan Pharmaceuticals Inc. (Mylan) is adding a new fluid bed unit, boiler and exhaust air cartridge collector as part of this permit application. This equipment is being added due to current production demand, equipment needs and future forecasting. The following table outlines increases in Particulate Matter emissions based on the past 5 years of permit applications:

Permit Name	Application Date	Increase in PM	Description of Changes
R13-2068O	June 2011	0 tons	<ul style="list-style-type: none"> • Modifications to RTO, Absorber, and Fluid Bed maximum load information.
R13-2068P	July 2013	-0.31 tons	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	September 2015	0 tons	<ul style="list-style-type: none"> • The addition of a coating pan and associated dust collector to the facility.
R13-2068S	June 2016	0.33 tons	<ul style="list-style-type: none"> • The addition of a fluid bed and associated dust collector to the facility, • The addition of a boiler, and • The replacement of a similar cartridge type dust collector for a fluid bed. • The replacement of similar cartridge type dust collectors for two coating pans.

Based on a minor increase of particulate matter, this permit application would not be a significant emissions increase or a significant net emissions increase per 45CSR14; therefore, 45CSR14 would not be applicable to this permit application.