July 2017

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

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

**PREPARED BY:**

**Mylan Pharmaceuticals Inc.**

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

**DIVISION OF AIR QUALITY**

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

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

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

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

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

☐ **ADMINISTRATIVE AMENDMENT** ☒ **MINOR MODIFICATION**
☐ **SIGNIFICANT MODIFICATION**

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

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

## *Section I. General*

1. Name of applicant *(as registered with the WV Secretary of State's Office):*
Mylan Pharmaceuticals Inc.

2. Federal Employer ID No. ***(FEIN):***
5 5 0 4 5 5 4 2 3

3. Name of facility *(if different from above):*
4. Chestnut Ridge Facility

4. The applicant is the:
☐ **OWNER** ☐ **OPERATOR** ☒ **BOTH**

5A. Applicant's mailing address:
P.O. Box 4310
Morgantown, WV 26504-4310

5B. Facility's present physical address:
781 Chestnut Ridge Road
Morgantown, WV 26505

6. **West Virginia Business Registration.** Is the applicant a resident of the State of West Virginia? ☒ **YES** ☐ **NO**

- If **YES,** provide a copy of the **Certificate of Incorporation/Organization/Limited Partnership** (one page) including any name change amendments or other Business Registration Certificate as **Attachment A.**
- If **NO,** provide a copy of the **Certificate of Authority/Authority of L.L.C./Registration** (one page) including any name change amendments or other Business Certificate as **Attachment A.**

7. If applicant is a subsidiary corporation, please provide the name of parent corporation: Mylan Inc.

8. Does the applicant own, lease, have an option to buy or otherwise have control of the *proposed site?* ☒ **YES** ☐ **NO**

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

9. Type of plant or facility (stationary source) to be **constructed, modified, relocated, administratively updated** or **temporarily permitted** (e.g., coal preparation plant, primary crusher, etc.):
Pharmaceutical Manufacturing Facility

10. North American Industry Classification System **(NAICS)** code for the facility:
325412

11A. DAQ Plant ID No. (for existing facilities only):
0 6 1 – 0 0 0 3 3

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):
R13-2068T, issued 04/04/2017
R30-06100033-2017 MM01, awaiting issuance

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

12A.

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

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

| 12.B. New site address (if applicable): | 12C. Nearest city or town: | 12D. County: |
|---|---|---|
| N/A | Morgantown | Monongalia |
| 12.E. UTM Northing (KM): 4390.1 | 12F. UTM Easting (KM): 589.6 | 12G. UTM Zone: 17 |

13. Briefly describe the proposed change(s) at the facility:
Mylan proposes to add VOC-containing solvent processing capability on existing fluid bed 24410 (EP ID 583) and on all listed solvent rated coating pans 4549, 4027, 7552, 8421, 23581, 30426, (EP IDs 241, 242, 244, 245, 246 and 247) at any given time.

| 14A. Provide the date of anticipated installation or change: Modification: 09/01/2017<br>– 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:<br>09/01/2017 |
|---|---|

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

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

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

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

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

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

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

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

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

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

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

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

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H.**

– For chemical processes, provide a MSDS for each compound emitted to the air.

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

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

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

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

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

☒ General Emission Unit, specify: F

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

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

| | | |
|---|---|---|
| ☐ Absorption Systems | ☒ Baghouse (Cartridge collector) | ☐ Flare |
| ☐ Adsorption Systems | ☐ Condenser | ☐ Mechanical Collector |
| ☐ Afterburner | ☐ Electrostatic Precipitator | ☐ Wet Collecting System |

☐ Other Collectors, specify:

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

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

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

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

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

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

☐ **YES** ☒ **NO**

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

## *Section III. Certification of Information*

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

| | |
|---|---|
| ☐ Authority of Corporation or Other Business Entity | ☐ Authority of Partnership |
| ☐ Authority of Governmental Agency | ☐ Authority of Limited Partnership |

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

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

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

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

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

***Compliance Certification***

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

SIGNATURE _____ *(Please use blue ink)* DATE: 07.19.2017 *(Please use blue ink)*

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

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

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

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

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

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

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

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

**Attachment A**

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

# WEST VIRGINIA
# STATE TAX DEPARTMENT
# BUSINESS REGISTRATION CERTIFICATE

ISSUED TO:

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

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

This certificate is issued on: **06/24/2010**

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

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

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

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

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

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

atL006 v.1
L2137111296

**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**

0001920201000

**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

APPLICATION FOR NSR PERMIT
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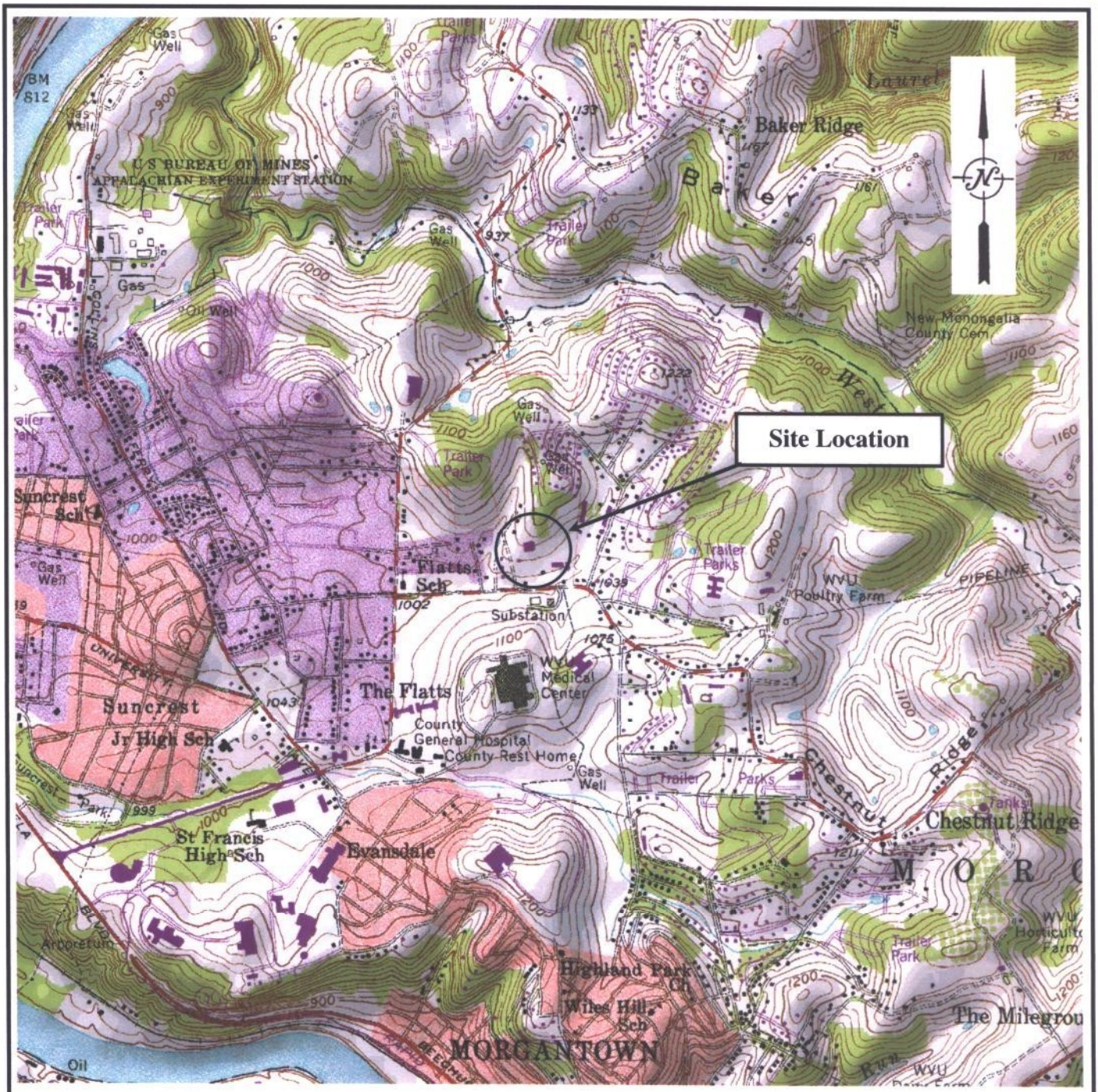
**Attachment B**

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




| | | |
|---|---|---|
| Reference:<br>3-D TopoQuads © DeLorme, Yarmouth, Me 04096<br>Source Data:<br>7.5 Minute USGS Topographic Quadrangle<br><br>Morgantown North, WV | **Vicinity Map**<br><br>Scale 1" = 2000' | **Mylan Pharmaceuticals**<br><br>**Air Permit Application** |

APPLICATION FOR NSR PERMIT
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**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 |
|---|---|---|
| Existing Fluid Bed 24410 (EP ID 583) | Equipment already installed | Equipment already in operation. VOC-containing solvent use beginning January 1, 2018. |
| Existing Coating Pans 4549, 4027, 7552, 8421, 23581, 30426, (EP IDs 241, 242, 244, 245, 246 and 247) | Equipment already installed | Equipment already in operation. VOC-containing solvent use for all coating pans, at any given time, beginning January 1, 2018. |

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**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<br>Coating pans | 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 | Fluid Bed<br>Coating pans | PM emission limits from all PM-emitting vent points other than the boilers vent points. | Proper operation and maintenance of cartridge collectors. |

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

**Presumed Non-Applicable Air Quality Requirements**

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

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**Attachment E**

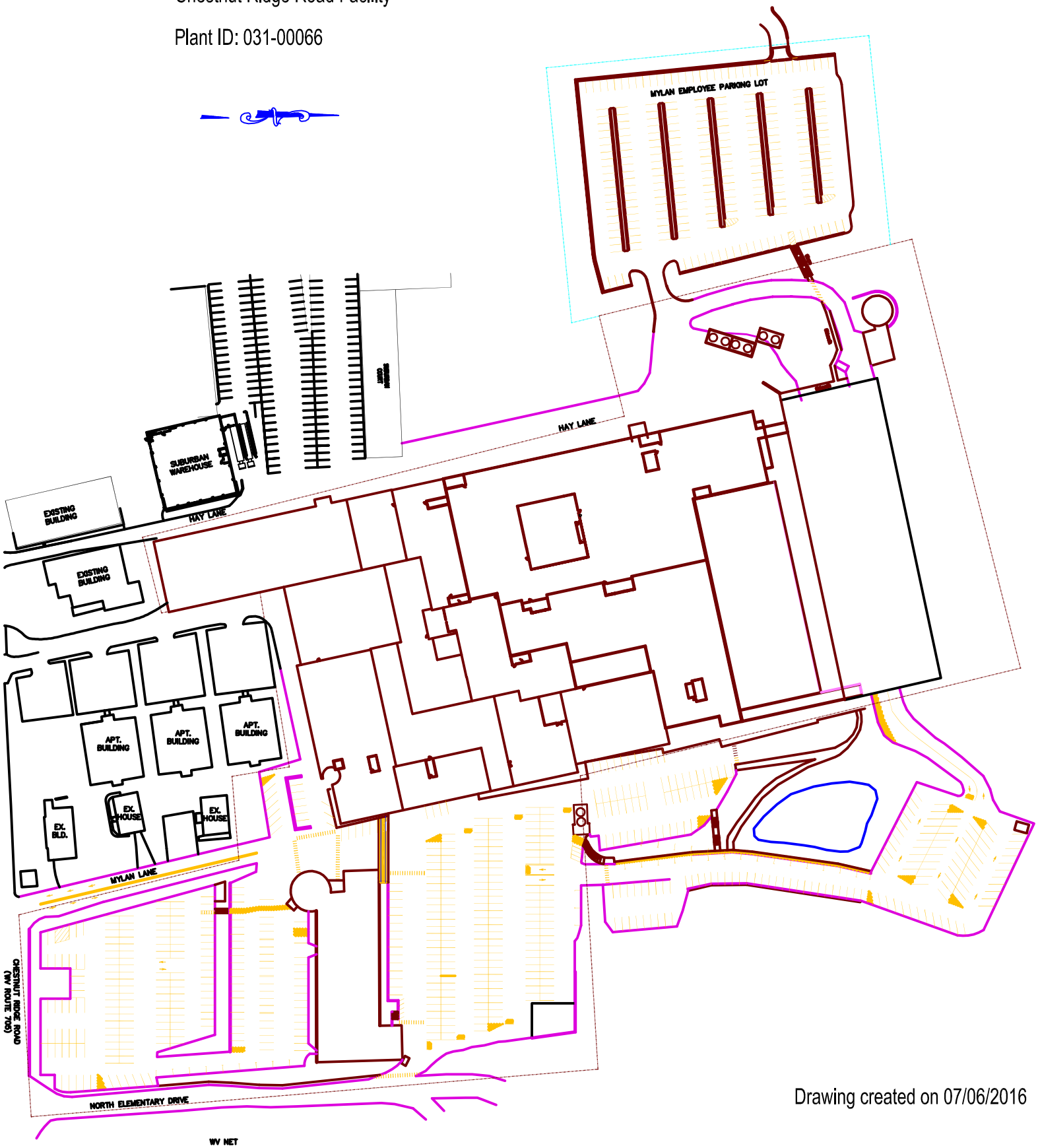
MYLAN PHARMACEUTICALS INC.
PLANT ID# 061-00033
MORGANTOWN, WEST VIRGINIA

**Attachment E - Plot Plan**

Mylan Pharmaceuticals, Inc.

Chestnut Ridge Road Facility

Plant ID: 031-00066




Drawing created on 07/06/2016

APPLICATION FOR NSR PERMIT
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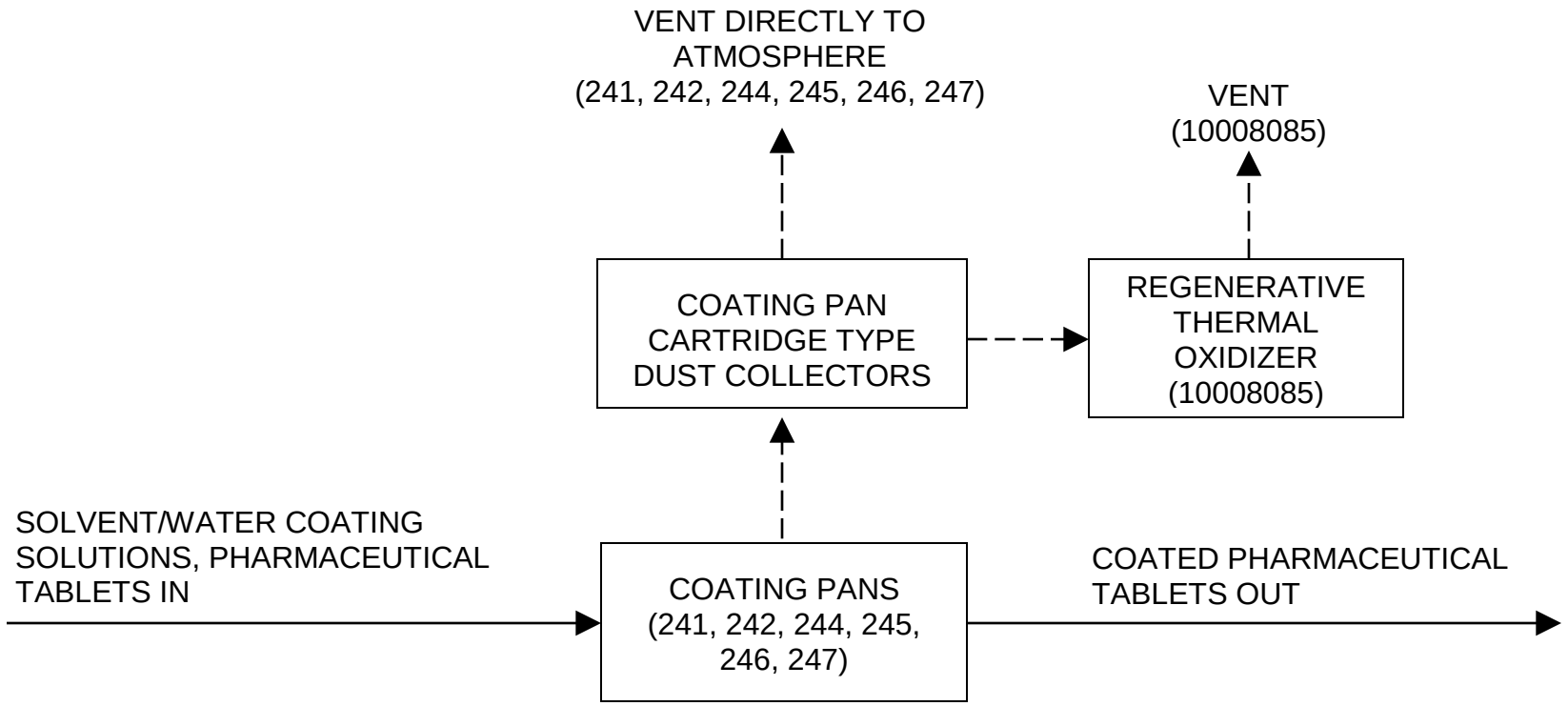
**Attachment F**

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




MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV

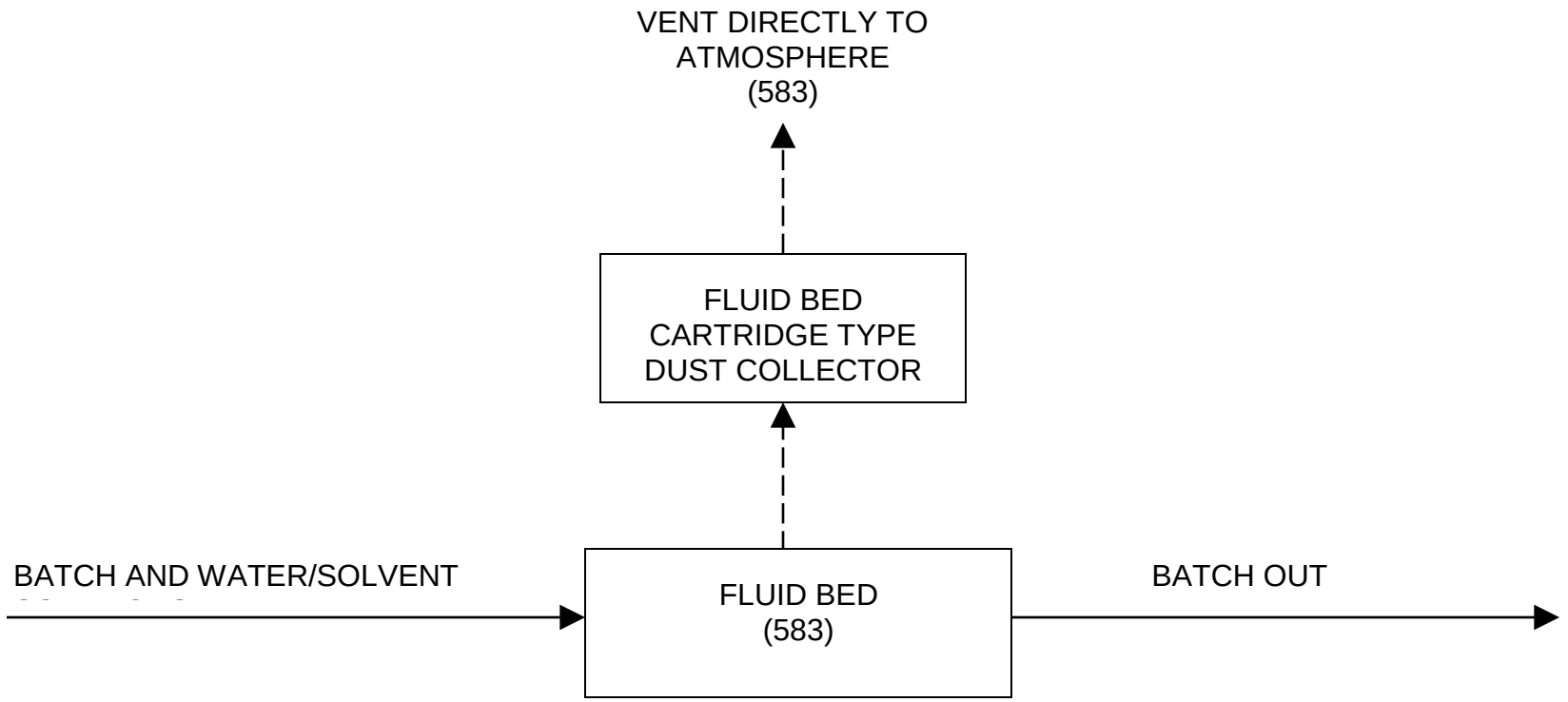
45CSR13 APPLICATION
ATTACHMENT F

FLUID BED
PROCESS FLOW DIAGRAM

**LEGEND**

Product Flow

Emission




MYLAN PHARMACEUTICALS INC.
MORGANTOWN, WV

45CSR13 APPLICATION
ATTACHMENT F

FLUID BED
PROCESS FLOW DIAGRAM

**LEGEND**

Product Flow

Emission

APPLICATION FOR NSR PERMIT
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**Attachment G**

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

# ATTACHMENT G – PROCESS DESCRIPTION

## Chestnut Ridge Road Facility Overview

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

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

## Coating Pans

Coating pans are used to coat tablets by mixing coating agents with water and/or solvents, depending on the product formulation, into a solution. This solution is sprayed onto the tablets, as they are agitated, and dried using heated air. The exhaust particulate matter emissions for each coating pan is controlled by a cartridge type dust collection system. Solvent emissions for coating pans designed to safely process flammable liquids are controlled using the RTO or vented directly to the atmosphere.

## Fluid Beds

The fluid beds are used to dry powder or tablets that are mixed, compounded, and formulated with water and/or solvents. Dry materials are gravity 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 fluid beds is controlled by a cartridge type dust collector and internal fluid bed filter system for particulate matter. The processing emissions of VOC-containing solvent for the proposed fluid bed in this application will be vented directly to the atmosphere.

APPLICATION FOR NSR PERMIT
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**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] |
|---|---|---|---|---|---|---|
| ***241*** | ***241*** | ***Coating Pan 4549*** | ***2009*** | ***750 lbs/load*** | ***VOC Limit Modification*** | ***CC EF4553*** |
| ***242*** | ***242*** | ***Coating Pan 4027*** | ***2008*** | ***245 lbs/load*** | ***VOC Limit Modification*** | ***CC EF4101*** |
| ***244*** | ***244, 10008085*** | ***Coating Pan 7552*** | ***2010*** | ***750 lbs/load*** | ***VOC Limit Modification*** | ***CC EF7674 ; RTO*** |
| ***245*** | ***245, 10008085*** | ***Coating Pan 8421*** | ***2010*** | ***750 lbs/load*** | ***VOC Limit Modification*** | ***CC 10024525; RTO*** |
| ***246*** | ***246, 10008085*** | ***Coating Pan 23581*** | ***2015*** | ***750 lbs/load*** | ***VOC Limit Modification*** | ***CC 10023583; RTO*** |
| ***247*** | ***247, 10008085*** | ***Coating Pan 30426*** | ***2017*** | ***750 lbs/load*** | ***VOC Limit Modification*** | ***CC 10024526; RTO*** |
| ***583*** | ***583*** | ***Fluid Bed 24410*** | ***2016*** | ***Up to 575 Kg/Load*** | ***VOC Limit Modification*** | ***CC 10024247*** |

[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.

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**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] (ppm or mg/m$^4$) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | ID No. | Source | ID No. | Device Type | Short Term[2] | Max (hr/yr) | | lb/hr | ton/yr | lb/hr | ton/yr | | | |
| 241, 242, 244, 245, 246, 247 | Upward vertical stack | 241, 242, 244, 245, 246, 247 | Coating Pan | EF4553, EF4101, EF7674, 10024525, 10023583, 10024526 | Cartridge Type Dust Collector | N/A | N/A | PM | 16.88 each *(241, 244, 245, 246, 247)*<br>5.5 *(242)* | 41.78 each *(241, 244, 245, 246, 247)* | 0.84 each *(241, 244, 245, 246, 247)*<br>0.28 *(242)* | 6.25 *(current limit in R13-2068T and Title V for Emission Units 241, 242, 244, 245 and 246, 247)* | Solid; Particulate | MB | N/A |
| 241, 242, 244, 245, 246, 247 | Upward vertical stack | 241, 242, 244, 245, 246, 247 | Coating Pan | 241, 242, 244, 245, 246, 247, 10008085 | Atmosphere / Regenerative Thermal Oxidizer (RTO) | N/A | N/A | Non-HAP VOC *(IPA & Ethanol)* | 396.9 | 10.0 *(All coating pans - proposed modification to R13-2068 and Title V)* | 7.94 each | 10.0 *(All coating pans - proposed modification to R13-2068 and Title V)* | Gas/Vapor | MB | N/A |
| 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 | MB | N/A |
| 583 | Upward vertical stack | 583 | Fluid Bed | 583 | Atmosphere | N/A | N/A | Non-HAP VOC *(IPA & Ethanol)* | 529.2 | 74.0 *(All Fluid Beds)*<br>*Based off FB VOC limit in R13-2068T | N/A | N/A | Gas/Vapor | EE | N/A |

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

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

[2] Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify

frequency of venting (e.g., 5 min/day, 2 days/wk).

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

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

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

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

[7] Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter ($mg/m^3$) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is $SO_2$, use units of ppmv (See 45CSR10).

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

| Table 2: Release Parameter Data | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Emission Point ID No. *(Must match Emission Units Table)* | Inner Diameter (ft.) | Exit Gas | | | Emission Point Elevation (ft) | | UTM Coordinates (km) | |
| | | Temp. (°F) | Volumetric Flow [1] (acfm) *at operating conditions* | Velocity (fps) | Ground Level *(Height above mean sea level)* | Stack Height [2] *(Release height of emissions above ground level)* | Northing | Easting |
| 241, 242, 244, 245, 246, 247 | N/A | 70-100 | Varies | Varies | Varies | Varies | Approx: Zone 17; 4390.554097142205 (Lat 39.660129) | Approx: Zone 17; 589.3285978954759 (Long -79.958659) |
| 583 | 21” | 70-150 | Varies | Varies | ~1000 | ~80 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

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

   Fluid Bed (TBD) manufactured by Vector Corporation (EP ID 583).

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

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

   Dry powder raw pharmaceutical materials will be mixed, 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 and/or non-HAP solvents.

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

   Dry granulated pharmaceutical materials will be produced in quantities of approximately 575 kg per hour for fluid bed size 300 (EP ID 583) on average.

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

   None

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

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

Not Applicable

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

Not Applicable

(c) Theoretical combustion air requirement (ACF/unit of fuel):

N/A @ °F and psia.

(d) Percent excess air: N/A

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

Not Applicable

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

Not Applicable

(g) Proposed maximum design heat input: Not Applicable $\times 10^6$ BTU/hr.

7. Projected operating schedule:

| | | | | | |
|---|---|---|---|---|---|
| Hours/Day | 18 | Days/Week | 7 | Weeks/Year | 50 |

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

@ Varies °F and Ambient psia

| | | | | | |
|---|---|---|---|---|---|
| a. | $NO_X$ | N/A | lb/hr | N/A | grains/ACF |
| b. | $SO_2$ | N/A | lb/hr | N/A | grains/ACF |
| c. | CO | N/A | lb/hr | N/A | grains/ACF |
| d. | $PM_{10}$ | 0.63 (size 300) | lb/hr | | grains/ACF |
| e. | Hydrocarbons | N/A | lb/hr | N/A | grains/ACF |
| f. | VOCs | 529.2 | lb/hr | | grains/ACF |
| g. | Pb | N/A | lb/hr | N/A | grains/ACF |
| h. | Specify other(s) | | | | |
| | None | N/A | lb/hr | N/A | grains/ACF |
| | | | lb/hr | | grains/ACF |
| | | | lb/hr | | grains/ACF |
| | | | lb/hr | | grains/ACF |

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

(2) Complete the Emission Points Data Sheet.

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

| MONITORING | RECORDKEEPING |
|---|---|
| Quarterly visible emission observations (conducted on external cartridge collector) | Maintain records of DC visual emission observations. Keep monthly records of non-HAP VOC solvents used, number of batches in which non-HAP VOC solvents were used |
| **REPORTING** | **TESTING** |
| N/A | N/A |

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

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

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

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

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

Each fluid bed unit contains an integral bag type filter, which is not considered to be separate control device. The manufacturer's efficiency rating of the integral filter is 99.95% control of particulate matter. The emission rates above represent air emission from the fluid bed and bag filter combination.

Preventative maintenance and inspections are performed on the fluid bed filter bags to ensure the integrity and conductivity are intact.

**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*): 241, 242, 244, 245, 246, 247

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

   Coating Pans manufactured by O'Hara Technologies

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

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

   Dry powder raw pharmaceutical materials will be mixed and formulated in quantities up to approximately 750 pounds per hour in Coating Pans 4549, 7552, 8421, 23581 and 30426 (EP IDs 241, 244, 245, 246 & 247) and 245 pounds per hour in Coating Pan 4027 (EP ID 242). Certain products may be mixed with water and/or non-HAP solvents.

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

   Dry powder raw pharmaceutical materials will be mixed and formulated in quantities up to approximately 750 pounds per hour in Coating Pans 4549, 7552, 8421, 23581 and 30426 (EP IDs 241, 244, 245, 246 & 247) and 245 pounds per hour in Coating Pan 4027 (EP ID 242).

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

   None

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

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

Not Applicable

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

Not Applicable

(c) Theoretical combustion air requirement (ACF/unit of fuel):

N/A @ °F and psia.

(d) Percent excess air: N/A

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

Not Applicable

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

Not Applicable

(g) Proposed maximum design heat input: Not Applicable $\times 10^6$ BTU/hr.

7. Projected operating schedule:

| | | | | | |
|---|---|---|---|---|---|
| Hours/Day | 18 | Days/Week | 7 | Weeks/Year | 50 |

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

@ Varies °F and Ambient psia

| | | | | | |
|---|---|---|---|---|---|
| a. | $NO_X$ | N/A | lb/hr | N/A | grains/ACF |
| b. | $SO_2$ | N/A | lb/hr | N/A | grains/ACF |
| c. | CO | N/A | lb/hr | N/A | grains/ACF |
| d. | $PM_{10}$ | **16.88** (241, 244, 245, 246, 247) **5.51** (242) | lb/hr | | grains/ACF |
| e. | Hydrocarbons | N/A | lb/hr | N/A | grains/ACF |
| f. | VOCs | **396.9** (241, 242, 244, 245, 246, 247) | lb/hr | | grains/ACF |
| g. | Pb | N/A | lb/hr | N/A | grains/ACF |
| h. | Specify other(s) | | | | |
| | None | N/A | lb/hr | N/A | grains/ACF |
| | | | lb/hr | | grains/ACF |
| | | | lb/hr | | grains/ACF |
| | | | lb/hr | | grains/ACF |

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

(2) Complete the Emission Points Data Sheet.

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

| MONITORING | RECORDKEEPING |
|---|---|
| Quarterly visible emission observations (conducted on external cartridge collector) | Maintain records of DC visual emission observations. Keep monthly records of non-HAP VOC solvent used, number of batches in which non-HAP VOC solvent was used. |
| REPORTING | TESTING |
| N/A | N/A |

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

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

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

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

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

N/A

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

**Attachment M**

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

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

Control Device ID No. (must match Emission Units Table): CC EF4553 (Coating Pan 4549 (EP ID 241) )

**Equipment Information and Filter Characteristics**

1. Manufacturer: Torit
   Model No. DFT 2-16
   Note: These collectors are cartridge style collectors

2. Total number of compartments: 2

3. Number of compartment online for normal operation: 2

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

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

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

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

8. Total cloth area: 3040 $ft^2$

9. Number of bags: 16 cartridges

10. Operating air to cloth ratio: N/A ft/min

11. Baghouse Operation: ☐ Continuous ☐ Automatic ☒ Intermittent

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

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

14. Operation Hours: Max. per day: 18
   Max. per yr: 4950

15. Collection efficiency: Rating: 99.9 %
   Guaranteed minimum: 99.9 %

**Gas Stream Characteristics**

16. Gas flow rate into the collector: 4000 ACFM at 70-100 °F and PSIA
   ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: 70-100 °F

19. Fan Requirements: 10 hp
   OR $ft^3$/min

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

21. Particulate Loading: Inlet: varies grain/scf Outlet: varies grain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type):
Non-hazardous pharmaceutical dust

23. Is there any $SO_3$ in the emission stream? ☒ No ☐ Yes $SO_3$ content: ppmv

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

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

25. Complete the table:

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

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☒ Visual opacity readings, Frequency: Quarterly
- ☐ Other, specify:

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

None

28. Describe any filter seeding being performed:

None

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

None

30. Describe the collection material disposal system:

Material is collected in drums and sent off site to a waste-to-energy facility for disposal.

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

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

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

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

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

100%

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

99.9%

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

N/A

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

Control Device ID No. (must match Emission Units Table): CC EF7674 (Coating Pan #7552 (EP ID 244) )

**Equipment Information and Filter Characteristics**

1. Manufacturer: Donaldson
   Model No. DFO 3-12
   Note: These collectors are cartridge style collectors

2. Total number of compartments: 2

3. Number of compartment online for normal operation: 2

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

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

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

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

8. Total cloth area: 2,280 $ft^2$

9. Number of bags: 12 cartridges

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

11. Baghouse Operation: ☐ Continuous ☐ Automatic ☒ Intermittent

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

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

14. Operation Hours: Max. per day: 24
   Max. per yr: 8736

15. Collection efficiency: Rating: 99.9 %
   Guaranteed minimum: 99.9 %

**Gas Stream Characteristics**

16. Gas flow rate into the collector: 4,000 ACFM at 70-100 °F and PSIA
   ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: 70-100 °F

19. Fan Requirements: 10 hp
   OR $ft^3$/min

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

21. Particulate Loading: Inlet: varies grain/scf Outlet: varies grain/scf

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

23. Is there any $SO_3$ in the emission stream? ☒ No ☐ Yes $SO_3$ content: ppmv

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

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

25. Complete the table:

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

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☒ Visual opacity readings, Frequency: Quarterly
- ☐ Other, specify:

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

None

28. Describe any filter seeding being performed:

None

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

None

30. Describe the collection material disposal system:

Material is collected in drums and sent off site to a waste-to-energy facility for disposal.

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

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

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

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

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

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

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

n/a

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

Control Device ID No. (must match Emission Units Table): CC 10024525 (Coating Pan #8421 (EP ID 245))

**Equipment Information and Filter Characteristics**

1. Manufacturer: Donaldson
   Model No. DFO 3-12
   Note: These collectors are cartridge style collectors

2. Total number of compartments: 2

3. Number of compartment online for normal operation: 2

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

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

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

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

8. Total cloth area: 2,280 $ft^2$

9. Number of bags: 12 cartridges

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

11. Baghouse Operation: ☐ Continuous ☐ Automatic ☒ Intermittent

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

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

14. Operation Hours: Max. per day: 24
   Max. per yr: 8736

15. Collection efficiency: Rating: 99.9 %
   Guaranteed minimum: 99.9 %

**Gas Stream Characteristics**

16. Gas flow rate into the collector: 4,000 ACFM at 70-100 °F and PSIA
   ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: 70-100 °F

19. Fan Requirements: 10 hp
   OR $ft^3$/min

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

21. Particulate Loading: Inlet: varies grain/scf Outlet: varies grain/scf

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

23. Is there any $SO_3$ in the emission stream? ☒ No ☐ Yes $SO_3$ content: ppmv

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

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

25. Complete the table:

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

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☒ Visual opacity readings, Frequency: Quarterly
- ☐ Other, specify:

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

None

28. Describe any filter seeding being performed:

None

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

None

30. Describe the collection material disposal system:

Material is collected in drums and sent off site to a waste-to-energy facility for disposal.

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

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

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

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

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

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

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

TBD when unit arrives

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

Control Device ID No. (must match Emission Units Table): CC 10023583 (Coating Pan 23581 (EP ID 246)

**Equipment Information and Filter Characteristics**

1. Manufacturer: Torit
   Model No. DFO 3-12
   Note: These collectors are cartridge style collectors

2. Total number of compartments: 2

3. Number of compartments online for normal operation: 2

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

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

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

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

8. Total cloth area: 1068 $ft^2$

9. Number of bags: 12 cartridges

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

11. Baghouse Operation: ☐ Continuous ☐ Automatic ☒ Intermittent

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

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

14. Operation Hours: Max. per day: 24
   Max. per yr: 8736

15. Collection efficiency: Rating: 99.9 %
   Guaranteed minimum: 99.9 %

**Gas Stream Characteristics**

16. Gas flow rate into the collector: 4,000 ACFM at 70-100 °F and PSIA
   ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: 70-100 °F

19. Fan Requirements: 10 hp
   OR $ft^3$/min

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

21. Particulate Loading: Inlet: varies grain/scf Outlet: varies grain/scf

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

23. Is there any $SO_3$ in the emission stream? ☒ No ☐ Yes $SO_3$ content: ppmv

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

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

25. Complete the table:

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

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☒ Visual opacity readings, Frequency: Quarterly
- ☐ Other, specify:

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

None

28. Describe any filter seeding being performed:

None

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

None

30. Describe the collection material disposal system:

Material is collected in drums and sent off site to a waste-to-energy facility for disposal.

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

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

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

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

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

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

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

TBD when unit arrives

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

Control Device ID No. (must match Emission Units Table): CC 10024526 (Coating Pan 30426 (EP ID 247))

**Equipment Information and Filter Characteristics**

1. Manufacturer: Donaldson
   Model No. DFO 3-12
   Note: These collectors are cartridge style collectors

2. Total number of compartments: 2

3. Number of compartment online for normal operation: 2

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

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

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

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

8. Total cloth area: 2,280 $ft^2$

9. Number of bags: 12 cartridges

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

11. Baghouse Operation: ☐ Continuous ☐ Automatic ☒ Intermittent

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

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

14. Operation Hours: Max. per day: 24
   Max. per yr: 8736

15. Collection efficiency: Rating: 99.9 %
   Guaranteed minimum: 99.9 %

**Gas Stream Characteristics**

16. Gas flow rate into the collector: 4,000 ACFM at 70-100 °F and PSIA
   ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: 70-100 °F

19. Fan Requirements: 10 hp
   OR $ft^3$/min

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

21. Particulate Loading: Inlet: varies grain/scf Outlet: varies grain/scf

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

23. Is there any $SO_3$ in the emission stream? ☒ No ☐ Yes $SO_3$ content: ppmv

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

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

25. Complete the table:

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

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☒ Visual opacity readings, Frequency: Quarterly
- ☐ Other, specify:

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

None

28. Describe any filter seeding being performed:

None

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

None

30. Describe the collection material disposal system:

Material is collected in drums and sent off site to a waste-to-energy facility for disposal.

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

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

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

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

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

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

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

N/A

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

Control Device ID No. (must match Emission Units Table): CC EF4101 (Coating Pan 4027 (EP ID 242))

**Equipment Information and Filter Characteristics**

1. Manufacturer: Torit
   Model No. DFT 2-8
   Note: These collectors are cartridge style collectors

2. Total number of compartments: 2

3. Number of compartment online for normal operation: 2

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

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

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

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

8. Total cloth area: 750 $ft^2$

9. Number of bags: 8 cartridges

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

11. Baghouse Operation: ☐ Continuous ☐ Automatic ☒ Intermittent

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

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

14. Operation Hours: Max. per day: 24
   Max. per yr: 8736

15. Collection efficiency: Rating: 99.9 %
   Guaranteed minimum: 99.9 %

**Gas Stream Characteristics**

16. Gas flow rate into the collector: 4000 ACFM at 70-100 °F and PSIA
   ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: 70-100 °F

19. Fan Requirements: 10 hp
   OR $ft^3/min$

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

21. Particulate Loading: Inlet: varies grain/scf Outlet: varies grain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type):
Non-hazardous pharmaceutical dust

23. Is there any $SO_3$ in the emission stream? ☒ No ☐ Yes $SO_3$ content: ppmv

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

| | IN | | OUT | |
|---|---|---|---|---|
| **Pollutant** | **lb/hr** | **grains/acf** | **lb/hr** | **grains/acf** |
| PM | 5.5 | | 0.28 | |
| | | | | |

25. Complete the table:

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

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☒ Visual opacity readings, Frequency: Quarterly
- ☐ Other, specify:

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

None

28. Describe any filter seeding being performed:

None

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

None

30. Describe the collection material disposal system:

Material is collected in drums and sent off site to a waste-to-energy facility for disposal.

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

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

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

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

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

100%

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

99%

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

N/A

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

Control Device ID No. (must match Emission Units Table): CC 10024247 (Fluid Bed 24410 (EP ID 583))

**Equipment Information and Filter Characteristics**

1. Manufacturer: Donaldson
   Model No. DFO 3-18
   Note: These collectors are cartridge style collectors

2. Total number of compartments: 2

3. Number of compartment online for normal operation: 2

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

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

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

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

8. Total cloth area: 3,420 $ft^2$

9. Number of bags: 18 cartridges

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

11. Baghouse Operation: ☒ Continuous ☐ Automatic ☐ Intermittent

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

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

14. Operation Hours: Max. per day: 24
   Max. per yr: 8736

15. Collection efficiency: Rating: 99.9 %
   Guaranteed minimum: 99.9 %

**Gas Stream Characteristics**

16. Gas flow rate into the collector: varies at 70-150 °F and PSIA
   ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: 70-150°F

19. Fan Requirements: 100 hp
   OR $ft^3$/min

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

21. Particulate Loading: Inlet: varies grain/scf Outlet: varies grain/scf

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

23. Is there any $SO_3$ in the emission stream? ☒ No ☐ Yes $SO_3$ content: ppmv

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

| | IN | | OUT | |
|---|---|---|---|---|
| **Pollutant** | **lb/hr** | **grains/acf** | **lb/hr** | **grains/acf** |
| PM | 0.6 | - | 0.04 | - |
| | | | | |

25. Complete the table:

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

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☒ Visual opacity readings, Frequency: Quarterly
- ☐ Other, specify:

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

None

28. Describe any filter seeding being performed:

None

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

None

30. Describe the collection material disposal system:

Material is collected in drums and sent off site to a waste-to-energy facility for disposal.

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

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

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

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

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

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

35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.
N/A

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 six (6) existing coating pans and associated dust collectors and one (1) existing fluid bed and associated dust collector.

1. Six (6) existing, previously permitted Coating Pans will require the capability to process, at any given time, VOC solvent based solutions to tablets due to product forecasts and production requirements. Coating Pans 7552, 8421, 23581 and 30426 (EP IDs 244, 245, 246 & 247) will direct VOC emissions to the regenerative thermal oxidizer (RTO) or vent to the atmosphere. Coating Pans 4549 and 4027 (EP IDs 241 & 242) will vent to atmosphere. All associated dust collectors will remain in place to capture particulate emissions from tablet breakage or solution overspray.
2. One (1) existing, previously permitted Fluid Bed will require the capability to process and granulate powders or spray solutions containing VOC solvent or aqueous based solutions due to product forecasts and production requirements. Fluid Bed 24410 (EP ID 583) will direct VOC emissions to the atmosphere. The associated dust collector will remain in place to capture particulate emissions from powder granulating and drying processing or solution overspray.

**Plant: Mylan Pharmaceuticals Inc. - Morgantown, WV (WVDAQ ID# 06100033)**
**Reason for Application: Coating Pan Permit VOC Permit Limit Increase Due to Forcasted Increase in Production**
**Process/Equipment Affected: Coating Pans**

| 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) | Each Coating Pan Hourly Rate (lb/hr) | Each Coating Pan Hours Oper. (hr/yr) | All Coating Pans Annual Rate (ton/yr) |
| 244, 245, 246, 247 | VOC emissions from processing with non-HAP solvents | 3000 g/min spray rate | 244, 245, 246, 247 | P | RTO for VOC Destruction | 244, 245, 246, 247 | 98% | VOC | N | MB | 396.9 | **7.94** | varies | **10 (Proposed total VOC limit for all applicable Coating Pans)** |
| 241, 244, 245, 246, 247 | VOC emissions from processing with non-HAP solvents | 3000 g/min spray rate | 241, 244, 245, 246, 247 | P | None; VOCs emitted to atmosphere | 241, 244, 245, 246, 247 | N/A | VOC | N | MB | 396.9 | N/A | varies | |
| 242 | VOC emissions from processing with non-HAP solvents | 3000 g/min spray rate | 242 | P | None; VOCs emitted to atmosphere | 242 | N/A | VOC | N | MB | 396.9 | N/A | varies | |
| 241, 244, 245, 246, 247 | PM Emissions from processing | 750 lb/load | 241, 244, 245, 246, 247 | P | Cartridge Collector | 215, 241, 244, 245, 246, 247 | 95% | PM | N | MB | 16.88 | **0.84** | varies | **6.25** |
| 242 | PM Emissions from processing | 245 lb/load | 242 | P | Cartridge Collector | 242 | 95% | PM | N | MB | 5.51 | **0.28** | varies | |

**BASIS FOR EMISSION ESTIMATES:**

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

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

*Overall Coating Pan Annual VOC Emissions*
g. Annual limit = 10.0 tpy Proposed (5.0 tpy as currently stated in R13-2068T)
Note: Coating Pans are authorized to emit to the RTO and to the atmosphere. Value based on product type and forecast, and use of RTO. Value is not dependent on hourly rates.)

**1. PARTICULAR MATTER (PM)**
***No Change to Current Permit Limits***
a. Assume 1.5% of powder from load is emitted through exhaust connected to cartridge collector.
b. Cartridge Collector Control Efficient: 95% (per Permit R13-2068O)
c. Estimated upset factor: 1.5
d. Estimated Hourly Rate per pan (241, 244, 245, 246, 247) = (750 lb/load) * (1-0.95) *(0.015) / (1 hr) * (1.5) = 0.84 lb/hr
e. Estimated Hourly Rate per pan (242) = (245 lb/load) * (1-0.95) *(0.015) / (1 hr) * (1.5) = 0.28 lb/hr
g. Annual limit = 6.25 tpy
*(Annual limit adjusted based on product forecast. Not based on hourly rates.)*

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

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

**Reason for Application: Incorporate Fluid Bed use of VOC Solvents**

**Process/Equipment Affected: Existing Fluid Bed 24410 (EP ID 583)**

| 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: Fluid Bed Hourly Rate *without* Control Device (lb/hr) | MAXIMUM EMISSIONS: Fluid Bed Hourly Rate *with* Control Device (lb/hr) | MAXIMUM EMISSIONS: Fluid Bed Hours Oper. (hr/yr) | MAXIMUM EMISSIONS: Fluid Bed Annual Rate (ton/yr) | MAXIMUM EMISSIONS: All Fluid Beds Annual Rate (ton/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 583 | VOC emissions from processing with non-HAP solvents | Up to 575 kg/load Dry Raw Materials | 583 | P | No controls for VOC | NA | NA | **VOC** | N | MB | **529.2*** | **N/A** | 6300 | varies | **74.0** |
| 583 | PM Emissions from powder processing (fluid bed size 300) | Up to 575 kg/load Dry Raw Materials | 583 | P | Cartridge Collector | 10024247 | 95% | **PM** | N | MB | 0.63** | **0.1** | 6300 | **0.1** | N/A |

**BASIS FOR EMISSION ESTIMATES:**

**1. VOLATILE ORGANIC COMPOUNDS (VOC)**

a. Assume 100% of VOC (alcohols) added to fluid beds is emitted to atmosphere, except VOC exhausted to RTO and absorber.
b. Maximum alcohol production feed rate to a fluid bed is 240 kg/hr.
(Based on a spray rate of 4 kg/min.)
c. Production max. VOC emitted = 240 kg/hr * 2.205 lb/kg = 529.2 lb/hr.
d. Uncontrolled Hourly limit = 529.2 lb/hr

*The hourly rate is based on few products and will occur over a short time period and is not sustained.

*Overall Fluid Bed Annual VOC Emissions*

i. Annual limit = 74.0 tpy

(Adjusted based on product type and forecast and use of RTO and absorber. Not based on hourly rates.)

**2. PARTICULATE MATTER (PM)**

a. Maximum dry raw material powder feed rate to fluid bed, size 300, is 575 kg/hr.
c. Integral bag-type filters remove 99.95% of total PM.
d. Apply cartridge collector efficiency of 95% for total PM.
e. Annual Emission Rate = Hourly Emission Rate * Operating Time / 2000 lbs/ton.
f. Annual Emission Rate: 0.1 tpy for each fluid bed.

575 kg/hr * 2.205 lb * (1 - 0.9995) = 0.63 lb/hr
0.63 lb/hr * (1-0.95) = 0.03 lb/hr (Rounded to 0.1 lb/hr)
0.03 lb/hr * 6300 hr/yr / 2000 lbs/ton = 0.1 tpy

**Includes internal bag-type filter efficiency

**NOTES:**

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

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# Attachment P

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

# ATTACHMENT P – PUBLIC NOTICE

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

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

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

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

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

- 5 tons per year (tpy) of VOC solvents from Coating Pan processing

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

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.
Dated this the 24th day of February, 2017.

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

APPLICATION FOR NSR PERMIT
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# Attachment S

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

# Attachment S

## Title V Permit Revision Information

**1. New Applicable Requirements Summary**

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

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

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

Per 40 CFR 64.5, this application is not part of an initial Title V permit application (40 CFR 64.5(a)(1)) and not part of a significant Title V permit revision (40 CFR 64.5(a)(2)); therefore, CAM plan submittal is not required until the renewal of Mylan's Title V permit as stated in 40 CFR 64.5(a)(3).

**2. Non Applicability Determinations**

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

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

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

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

**3. Suggested Title V Draft Permit Language**

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

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

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

| Permit or Consent Order Number | Date of Issuance | Permit/Consent Order Condition Number |
|---|---|---|
| R13-2068T | 04/04/2017 | |
| R30-06100033-2017 MM01 | 06/09/2017 | |
| | / / | |

**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 |
|---|---|
| VOC | +5.00 tpy (10.00 tpy total for all Coating Pans) |
| | |
| | |
| | |
| | |
| | |

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

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

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

i. Proposed changes do not violate any applicable requirement;

ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;

iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;

v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;

vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

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

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

(Signed): _____ *(Please use blue ink)* Date: 07 / 19 / 2017 *(Please use blue ink)*

Named (typed): *John Sylvester* Title: *Head of OSD Site Operations*

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

| | |
|---|---|
| ☐ | Compliance Assurance Monitoring Form(s) |
| ☒ | Suggested Title V Draft Permit Language |

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

APPLICATION FOR NSR PERMIT
AND
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**Appendix 1**

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

*West Virginia Department of Environmental Protection*

*Jim Justice*
*Governor*

***Division of Air Quality***

*Austin Caperton*
*Cabinet Secretary*

# Permit Update

**R13-2068U~~T~~**

*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: April 4, 2017*

*This permit will supersede and replace Permit R13-2068TS issued on October 27, 2016.April 4, 2017.*

| | |
|---|---|
| Facility Location: | Morgantown, Monongalia County, West Virginia |
| Mailing Address: | 781 Chestnut Ridge Road, Morgantown, WV 26504 |
| Facility Description: | Pharmaceutical Manufacturing Facility |
| SIC/NAICS Codes: | 2834/325412 |
| UTM Coordinates: | 589.6 km Easting • 4,390.1 km Northing • Zone 17 |
| Latitude/Longitude: | 39.65913/-79.95824 |
| Permit Type: | Class II Administrative Update |
| Description of Change: | Addition of one (1) coating pan (247) and an associated dust collector (CC 10024526) and the addition of one (1) additional cartridge-type dust collector (CC 10030432) to control particulate matter emissions from specific production rooms (Rooms 74-101 to 74-110). |

*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.*

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*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.*

Table of Contents

## 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 |
| 016 | 016 | Boiler 24524: Natural Gas Boiler | 2016 | 6.0 MM Btu/hr | None |
| Rooms BL209, BL211, BL214, BL304, BL306, BL307, BL309 - BL314, BL316, BL402 - BL404, BL406 - BL414, BL416 | 287 | Room General Exhaust | 1996 | Varies | Rotoclone 6 |
| Rooms BB101 – BB103, BB106, BB108 - BB111, BB113 - BB118, BB201 - BB203, BB206 - BB208, BB210 - BB217, BB303, BB312 | 288 | Room General Exhaust | 1996 | Varies | Rotoclone 5 |
| Rooms 99-105, 99-114 - 99-122, 99-209, 85-205A - 85-208A, ORG201A-ORG204A | 291 | Room General Exhaust | 1999 | Varies | Rotoclone 7 |
| Rooms BB112, 85-106, 85-108, 85-114, 85-115, 85-102, 85-104, 85-107, 85-110 | 294 | Room General Exhaust | 2003 | Varies | Rotoclone 9 |
| Rooms BL218, BL219 | 295 | Room General Exhaust | 2004 | Varies | Rotoclone 10 |
| Rooms NEX140, NEX142, NEX144, NEX146, NEX159 - NEX162 | 296 | Room General Exhaust | 2005 | Varies | Rotoclone 2317 |

| 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 |
| Rooms 74-101 to 74-110 | 324 | Room General Exhaust | 2017 | Varies | CC 10030432 |
| 533 | 533 | Fluid Bed 527 | 1991 | Up to 575 Kg/Load | CC 10024047 |
| 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 24410 | 2016 | Up to 575 Kg/Load | CC 10024247 |
| 215 | 215 | Coating Pan 1390 | 1999 | 750 lbs/load | CC EF1390 |
| 241 | 241 | Coating Pan 4549 | 2009 | 750 lbs/load | CC EF4553 |
| 242 | 242 | Coating Pan 4027 | 2008 | 245 lbs/load | CC EF4101 |
| 244 | 244, 10008085[2] | Coating Pan 7552 | 2010 | 750 lbs/load | CC EF7674; 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 10024525; RTO |
| 246 | 246, 10008085[2] | Coating Pan 23581 | 2015 | 750 lbs/load | CC 10023583; RTO |
| 247 | 247, 10008085[2] | Coating Pan 30426 | 2017 | 750 lbs/load | CC 10024526; 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 |

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

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

## 2.0. General Conditions

### 2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

### 2.2. Acronyms

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

## 2.3. Authority

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

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

## 2.4. Term and Renewal

2.4.1. This permit supersedes and replaces previously issued Permit R13-2068S. 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 R13-2068T, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
**[45CSR§§13-5.11 and -10.3.]**

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

## 2.6. Duty to Provide Information

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

## 2.7. Duty to Supplement and Correct Information

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

## 2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
**[45CSR§13-4.]**

## 2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
**[45CSR§13-5.4.]**

## 2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
**[45CSR§13-5.1]**

## 2.11. Inspection and Entry

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

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

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

## 2.12. Emergency

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

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

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

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

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

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

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

## 2.14. Suspension of Activities

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

## 2.15. Property Rights

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

## 2.16. Severability

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

### 2.17. Transferability

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

### 2.18. Notification Requirements

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

### 2.19. Credible Evidence

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

## 3.0. Facility-Wide Requirements

### 3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
**[45CSR§6-3.1.]**

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
**[45CSR§6-3.2.]**

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
**[40CFR§61.145(b) and 45CSR§34]**

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
**[45CSR§4-3.1]** ***[State Enforceable Only]***

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
**[45CSR§13-10.5.]**

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
**[45CSR§11-5.2.]**

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

### 3.2. Monitoring Requirements

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

## 3.3. Testing Requirements

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

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

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

## 3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
**[45CSR§4. *State Enforceable Only.*]**

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

## 3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es), or submitted in electronic format by email as 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

**DAQ Compliance and Enforcement[1]:**
DEPAirQualityReports@wv.gov

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

[1] For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, notice of Compliance Status Reports, Initial Notifications, etc.

### 3.5.4. Operating Fee

3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

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

### 4.1. Limitations and Standards

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

### 4.2. Recordkeeping Requirements

4.2.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit, and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

4.2.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.2.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

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

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

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

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

### 5.1. Limitations and Standards

5.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. **[45CSR§2-3.1]** *(007, 008, 010, 011, 012, 013, 016)*

5.1.2. Compliance with the visible emission requirements of 45CSR2 subsection 3.1 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of subsection 3.1. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control. **[45CSR§2-3.2]** *(007, 008, 010, 011, 012, 013. 016)*

5.1.3. No person shall cause, suffer, allow or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:

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

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

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

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

**Table 5.1.4.: Fuel Burning Unit 45CSR10 $SO_2$ Limits**

| Emission Unit | $SO_2$ Emission Limit (lb/hr) |
|---|---|
| 011 | 67.2 |
| 012 | 67.2 |
| 013 | 67.2 |

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

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

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

| Pollutant | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (tpy) |
|---|---|---|
| CO | 0.59 | 2.58 |
| $NO_x$ | 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) |
|---|---|---|
| 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 24524 Emission Limits**

| Pollutant | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (tpy) |
|---|---|---|
| CO | 1.16 | 5.10 |
| $NO_x$ | 0.59 | 2.58 |
| $PM_{2.5}/PM_{10}/PM^{(1)}$ | 0.06 | 0.24 |
| $SO_2$ | 0.004 | 0.015 |
| VOCs | 0.06 | 0.26 |

(1) Including Condensables

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

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

| Pollutant | Maximum Hourly Emissions per Boiler (lb/hr) | Maximum Annual Emissions per Boiler (tpy) |
|---|---|---|
| CO | 4.07 | 17.84 |
| $NO_x$ | 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

5.1.10. The maximum amount of natural gas to be burned by a single boiler (Emission Points ID# 016) shall not exceed 6,000 cubic feet/hour or 52,600,000 cubic feet/year.

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

5.1.12. The three (3) Bryan Steam Corporation boilers (Emission Points ID # 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 (Emission Point ID#(s): 533, 534, 535, 536, 537, 538, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582 & 583)]

### 6.1. Limitations and Standards

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

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

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

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

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

6.1.3. Maximum particulate matter emissions ($PM_{2.5}$/$PM_{10}$/PM) to the atmosphere from each Fluid Bed shall not exceed 0.1 lb/hr and 0.1 tons/year.

6.1.4. Maximum hourly volatile organic compound emissions to the atmosphere from the Fluid Beds shall not exceed:

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

b. 10.59 lb/hr (as emitted from the RTO) each for Fluid Beds (Emission Point ID#(s): 534, 538, 572, 574 – 578, and 580) if venting exhaust to the RTO for the purpose of controlling VOC emissions; and

c. 26.46 lb/hr (as emitted from the absorber) each for Fluid Beds (Emission Point ID#(s): 573 and 579) if venting exhaust to the absorber for the purpose of controlling VOC emissions.

6.1.5. Maximum total combined annual volatile organic compound emissions to the atmosphere from the Fluid Beds shall not exceed 74.0 tons/year.

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

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

(1) Fluid Beds (Emission Point ID#(s): 534, 536, 538, 572, 574, 575, 577, 581): 250 kg/load
(2) Fluid Beds (Emission Point ID#(s): ~~-~~533, 535, 537, 571, 573, 576, 578, 579, 580, 582, 583: 575 kg/load

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

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

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

e. Fluid Beds (Emission Point ID#(s): 534, 538, 572, 574 – 578, and 580) shall have the capability of directing exhaust to the RTO for control of VOCs or emitting directly to atmosphere;

f. Fluid Beds (Emission Point ID#(s): 573 and 579) shall have the capability of directing exhaust to the absorber for control of VOCs or emitting directly to atmosphere; and

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

## 6.2. Monitoring Requirements

6.2.1. Visible emissions monitoring shall be conducted initially at least once per month of operation 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 ~~s once per calendar quarter~~three months of operation. If visible emissions are observed during ~~a quarterly~~ a 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 once per three months of operation ~~checks~~ only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

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

6.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 6.1.6(c), the permittee shall:

a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacture's recommendations concerning control device maintenance and performance;

b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and

c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.

6.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 6.1.6(a), the permittee shall monitor and record the total dry material per load for each fluid bed. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each fluid bed is equal or less than the maximum load given under 6.1.6(a) or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 6.1.6(a).

6.2.4. For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 6.1.6(b), the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material into the fluid beds.

6.2.5. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 6.1.5, the permittee shall:

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds (Emission Point ID#(s): 534, 538, and 572 – 580).

b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Fluid Beds (Emission Point ID#(s): 534, 538, and 572 – 580) when each bed is and is not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.

c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all fluid beds by summing the following:

(1) The total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds (Emission Point ID#(s): 534, 538, and 572 – 580).

(2) The total amount of VOCs in pounds used in Fluid Beds (Emission Point ID#(s): 534, 538, and 572 – 580) when not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.

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

(4) The total amount of VOCs used in Fluid Beds (Emission Point ID#(s): 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs. Based on compliance with Requirement 11.1.2 of this permit, the permittee may apply a VOC destruction efficiency of 95% to the amount of VOCs used in Fluid Beds (Emission Point ID#(s): 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs.

### 6.3. Testing Requirements

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

### 6.4. Recordkeeping Requirements

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

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

### 6.5. Reporting Requirements

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

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

### 7.1. Limitations and Standards

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

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

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

| 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) |
| 324 | 1.11(4) |

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

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

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

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

**Table 7.1.3.: Rotoclone Emission Limits**

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

7.1.4. The Rotoclone control devices and cartridge collector servicing production rooms shall be designed to achieve a collection efficiency of 98% for particulate matter emissions.

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

7.1.6. Maximum aggregate particulate matter (PM) emissions to the atmosphere from Emission Points 282, 296-300, and 305-324, as emitted through the applicable control devices listed under Table 1.0, shall not exceed a maximum hourly emission rate of 1.08 pounds per hour (lb/hr) and 2.77 tons per year (tpy).

7.1.7. The permittee shall maintain and operate low water supply pressure sensors with control panel alarms for each Rotoclone to ensure adequate water supply and flow rate to the Rotoclones at each emission point specified, in order to ensure proper operation of the Rotoclone.

## 7.2. Monitoring Requirements

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

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

7.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 7.1.4., the permittee shall:

a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacture's recommendations concerning control device maintenance and performance;

b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and

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

### 7.3. Testing Requirements

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

### 7.4. Recordkeeping Requirements

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

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

### 7.5. Reporting Requirements

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

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

### 8.1. Limitations and Standards

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

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

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

| Emission Unit | PM Emission Limit (lb/hr) |
|---|---|
| 215 | 0.90 |

| | |
|---|---|
| 241 | 0.90 |
| 242 | 0.29 |
| 244 | 0.90 |
| 245 | 0.90 |
| 246 | 0.90 |
| 247 | 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 (EF1390, EF4553, EF4101, EF7674, 10024525, 10023583 and 10024526)~~(215, 241, 242, 244, 245, 246, and 247)~~ at Emission Point ID Numbers 215, 241, 242, 244, 245, 246, and 247 shall not exceed the following:

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

| Emission Unit | $PM_{2.5}/PM_{10}/PM$ Emission Limit | |
|---|---|---|
| | Pound/hour | ton/year |
| 215 | 0.84 | 6.25 |
| 241 | 0.84 | |
| 242 | 0.28 | |
| 244 | 0.84 | |
| 245 | 0.84 | |
| 246 | 0.84 | |
| 247 | 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 (Emission Point ID#(s): 244, 245, 246, and 247) 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 10~~5~~.0 tons/year.

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

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

(1) Coating Pan (Emission Point ID# 215): 750 pound/load;
(2) Coating Pan (Emission Point ID# -241): 750 pound/load;
(3) Coating Pan (Emission Point ID# -242): 245 pound/load;
(4) Coating Pan (Emission Point ID# 244): 750 pound/load;
(5) Coating Pan (Emission Point ID# 245): 750 pound/load;

(6) Coating Pan (Emission Point ID# -246): 750 pound/load; and
(7) Coating Pan (Emission Point ID# 247): 750 pound/load.

b. The annual aggregate dry material loading of all coating pans shall not exceed 11,000,000 pounds on a rolling yearly total basis;

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

d. The solvent spray rate processed in coating pans (Emission Point ID#(s): 241, 242, 244, 245, 246, and 247) 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 Point ID# 215);

f. Coating Pans (-Emission point ID#(s):244, 245, 246, and 247) 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~~; and~~.

~~h. At any one time, a maximum of five (5) of the coating pans listed under 8.1.6(d) may utilize VOC containing solvents in the production process. The permittee shall develop and maintain a written compliance procedure to ensure the facility meets this requirement.~~

## 8.2. Monitoring Requirements

8.2.1. Visible emissions monitoring shall be conducted initially at least once per month of operation for all emission points subject to opacity limitations. After three consecutive monthly reading~~-~~s in which no visible emissions are observed from any of the subject emission points, those emission points will be allowed to conduct visible emissions checks once per three months of operation ~~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 once per three months of operation 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~~twelve-month total amount of VOCs in —pounds used in each coating pan with the exception of Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247).

b. Monitor and record the aggregate monthly and rolling ~~twelve month~~twelve-month total amount of VOCs in pounds used in Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247) when each coating pan is and is not venting exhaust to the RTO for the purpose of controlling VOCs.

c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all coating pans by summing the following:

(1) The total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247).

(2) The total amount of VOCs in pounds used in Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247) when not venting exhaust to the RTO for the purpose of controlling VOCs.

(3) The total amount of VOCs used in Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 9.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247) when venting exhaust to the RTO for the purpose of controlling VOCs.

## 8.3. Testing Requirements

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

## 8.4. Recordkeeping Requirements

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

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

### 8.5. Reporting Requirements

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

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

### 9.1. Limitations and Standards

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

Emissions (lb/hr) = F x Incinerator Capacity (tons/hr)

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

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

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

**[45CSR§6-4.1]**

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

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

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

| Pollutant | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (tpy) |
|---|---|---|
| CO | 28.76 | 10.44 |
| $NO_x$ | 49.11 | 14.90 |
| PM | 2.68 | 0.96 |
| $PM_{10}$ | 2.68 | 0.96 |
| $PM_{2.5}$ | 2.68 | 0.96 |
| $SO_2$ | 0.08 | 0.05 |
| 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 (Emission Point ID#(s) 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247); Oven Dryers (Emission Point ID#(s) 260, 261, and 264); and the Coating Line are venting exhaust to the RTO for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 98%.

9.1.6. The permittee shall, within 60 days of the date of the performance test required under 9.3.2, determine the optimal operating ranges of the RTO parameters listed under 9.1.6(a) and (b) so as to monitor the effective operation of the RTO. The determination of operating ranges shall be based on data obtained from performance testing, manufacturing recommendations, or operational experience. The permittee shall maintain on-site, and update as necessary, a certified report listing the operating ranges. Any changes to the operating ranges shall be accompanied by the date of the change and reason for the change.

a. Minimum RTO Combustion Chamber Temperature; and

b. RTO Exhaust Flow Rate.

9.1.7 The permittee shall, to the extent reasonably possible, operate the RTO within the operating ranges as established under 9.1.6 at all times Fluid Beds (Emission Point ID#(s) 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247); Oven Dryers (Emission Point ID#(s) 260, 261, and 264; and the Coating Line are venting exhaust to the RTO for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 9.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 6.2.5(c)(3), a VOC destruction efficiency of 98% may not be assumed for the duration of the venting of VOC from Fluid Beds (Emission Point ID#(s) 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247); Oven Dryers (Emission Point ID#(s) 260, 261, and 264); and the Coating Line.

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

## 9.2. Monitoring Requirements

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

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

9.2.2. For the purposes of demonstrating compliance with maximum annual natural gas combustion rates set forth in 9.1.4(b), the permittee shall monitor and record the rolling twelve month total of natural gas combusted by the RTO.

9.2.3. For the purposes of demonstrating compliance with maximum solvent combustion rates set forth in 9.1.4(c), the permittee shall monitor and record the amount of solvent, in pounds, sent to the RTO from Fluid Beds (Emission Point ID#(s) 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247); Oven Dryers (Emission Point ID#(s) 260, 261, and 264); and the Coating Line. The monthly and rolling twelve month total of solvent sent to RTO from Fluid Beds (Emission Point ID#(s) 534, 538, 572, 574 – 578, and 580); Coating Pans (Emission Point ID#(s) 244, 245, 246, and 247); Oven Dryers (Emission Point ID#(s) 260, 261, and 264); and the Coating Line shall be summed and recorded.

9.2.4. For the purposes of demonstrating compliance with the requirements set forth in 9.1.5, the permittee shall continuously monitor and record the RTO Combustion Chamber Temperature (as measured at the outlet of the combustion chamber) and the RTO Exhaust Flow Rate (as measured at the RTO outlet or based on fan instrumentation). Monitoring shall be effected by use of the following:

a. RTO Combustion Chamber Temperature: Thermocouples, RTDs, or alternative methods/instrumentation as appropriate for gas stream; and

b. RTO Exhaust Flow Rate: Differential pressure flow device, fan motor ammeter, or other type of device that measures gas velocity or flow rate.

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

## 9.3. Testing Requirements

9.3.1. Within 60 days after achieving the maximum solvent combustion rate at which the RTO(s) are permitted to operated at, but not later than 180 days after initial startup, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the RTO(s) to determine compliance with the CO and $NO_x$ emission limits listed in Table 9.1.3. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.

9.3.2. Within 60 days after achieving the maximum solvent combustion rate at which the RTO is permitted to operated at, but not later than 180 days after the initial use of the RTO to control of VOCs during a Fluid Bed production run, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the RTO to determine compliance with the minimum VOC destruction efficiency as given under 9.1.5. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.

## 9.4. Recordkeeping Requirements

9.4.1. The permittee shall record the date, duration, and any corrective action taken in the occurrence of an excursion of RTO operating parameters outside the ranges as established under 9.1.6. If corrective action was not successful in a timely fashion, the permittee shall record the amount of solvent sent to the RTO while the excursion occurred.

9.4.2. The permittee shall meet all record-keeping requirements as applicable to the RTO and given under section 3.4 and 4.2 of this permit.

## 9.5 Reporting Requirements

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

## 10.0. Source-Specific Requirements [Oven Dryers 260, 261, 264]

### 10.1. Limitations and Standards

10.1.1. Maximum hourly volatile organic compound emissions to the atmosphere from Oven Dryers (Emission Point ID#(s) 260, 261, and 264) shall not exceed:

a. 529.2 lb/hr for each Oven Dryer if not venting exhaust to the RTO for the purpose of controlling VOC emissions; and

b. 10.59 lb/hr (as emitted from the RTO) for each Oven Dryer if venting exhaust to the RTO for the purpose of controlling VOC emissions.

10.1.2. The maximum total combined annual volatile organic compound emissions to the atmosphere from Oven Dryers (Emission Point ID#(s) 260, 261, and 264) shall not exceed 5.0 tons/year.

10.1.3. Oven Dryers (Emission Point ID#(s) 260, 261, and 264) shall operate according to the following requirements:

a. Each Oven Dryer shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere; and

b. No HAP-containing solvents shall be processed in any Oven Dryer.

### 10.2. Monitoring Requirements

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

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Oven Dryers (Emission Point ID#(s) 260, 261, and 264) when each Oven Dryer is and is not venting exhaust to the RTO for the purpose of controlling VOCs; and

b. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from Oven Dryers (Emission Point ID#(s) 260, 261, and 264) by summing the following:

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

(2) The total amount of VOCs used in Oven Dryers (Emission Point ID#(s) 260, 261, and 264) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 9.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Oven Dryers (Emission Point ID#(s) 260, 261, and 264) when venting exhaust to the RTO for the purpose of controlling VOCs.

### 10.3. Testing Requirements

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

### 10.4. Recordkeeping Requirements

10.4.1. The permittee shall maintain a record of all solvents used in Oven Dryers (Emission Point ID#(s) 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 (Emission Point ID#(s) 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 95%.

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

a. Minimum Water Flow

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

11.1.4. The permittee shall, to the extent reasonably possible, operate the absorber within the operating ranges as established under 11.1.2. at all times Fluid Beds (Emission Point ID#(s) 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 11.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 6.2.5(c), a VOC destruction efficiency of 95% may not be assumed for the duration of the venting of VOC from Fluid Beds (Emission Point ID#(s) 573 and 579).

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

### 11.2. Monitoring Requirements

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

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

### 11.3. Testing Requirements

11.3.1. Within 60 days after achieving the maximum solvent exhaust rate at which the absorber is permitted to operate at, but not later than 180 days after the initial use of the absorber to control of VOCs during a Fluid Bed production run, and at such times thereafter as may be required by the

Secretary, the permittee shall conduct, or have conducted, a performance test on the absorber to determine compliance with the minimum VOC removal efficiency as given under 11.1.4. The permittee shall use EPA approved test methods unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.

## 11.4. Recordkeeping Requirements

11.4.1. The permittee shall record the date, duration, and any corrective action taken in the occurrence of an excursion of absorber operating parameters outside the ranges as established under 11.1.2. If corrective action was not successful in a timely fashion, the permittee shall record the amount of solvent sent to the absorber while the excursion occurred.

11.4.2. The permittee shall maintain records of Absorber low water flow rate alarms on site for five (5) years 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.

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

### 12.1. Limitations and Standards

12.1.1. Maximum hourly VOC/HAP emissions to the atmosphere from the Coating Line shall not exceed:

a. 7.0 lb/hr for the Coating Line if not venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions; and

b. 0.14 lb/hr (as emitted from the RTO) for the Coating Line if venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions.

12.1.2. The maximum annual VOC/HAP emissions to the atmosphere from Coating Line shall not exceed 3.0 tons/year.

12.1.3. The Coating Line shall have the capability of directing exhaust to RTO for control of VOC/HAPs or emitting directly to atmosphere.

### 12.2. Monitoring Requirements

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

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOC/HAPs in pounds used in the Coating Line when it is and is not venting exhaust to the RTO for the purpose of controlling VOC/HAPs; and

b. Calculate and record the monthly and rolling twelve month aggregate VOC/HAPs emissions from the Coating Line by summing the following:

(1) The total amount of VOC/HAPs in pounds used in the Coating Line when not venting exhaust to the RTO for the purpose of controlling VOCs; and

(3) The total amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 9.1.7 of this permit, the permittee may apply a VOC/HAPs destruction efficiency of 98% to the amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOC/HAPs.

### 12.3. Testing Requirements

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

### 12.4. Recordkeeping Requirements

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

### 12.5. Reporting Requirements

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

# CERTIFICATION OF DATA ACCURACY

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

Signature[1] _____ _____
(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.

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

**Appendix 2**

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

West Virginia Department of Environmental Protection
Division of Air Quality

*Jim Justice*
*Governor*

*Austin Caperton*
*Cabinet Secretary*

# Permit to Operate

Pursuant to
**Title V**
of the Clean Air Act

*Issued to:*
Mylan Pharmaceuticals, Inc.
Morgantown
**R30-06100033-2017 MM0~~1~~2**

William F. Durham
Director

*Issued: March 9, 2017 • Effective: March 23, 2017*
*Expiration: March 9, 2022 • Renewal Application Due: September 9, 2021*

Permit Number: **R30-06100033-2017 (MM01)**
Permittee: **Mylan Pharmaceuticals, Inc.**
Facility Name: **Morgantown**
Mailing Address: **781 Chestnut Ridge Road, Morgantown, WV 26505**

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*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.*

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

Permit Writer: Rex Compston, P.E.

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

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

## Table of Contents

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

## 1.1. Emission Units

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

| Emission Point ID | Control Device | Emission Unit ID | Mylan ID & Emission Unit Description | Design Capacity | Year Installed/ Modified |
|---|---|---|---|---|---|
| 246<br>10008085(2) | CC 23583; RTO* | 246 | Coating Pan 23581 | 750 lbs/load | 2015 |
| 247<br>10008085(2) | CC 10024526; RTO* | 247 | Coating Pan 30426 | 750 lbs/load | 2017 |
| 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 |
| 281 | Rotoclone 3 | Rooms 74-151, 74-153,91-129, 91-130, 91-132, 91-134 – 91-137, 91-139, 91-229, 91-230, 91-232, 91-329, 91-330, 91-332, 91-334 – 91-337 | Room General Exhaust | Varies | 1991 |
| 282 | Rotoclone 3798* | Rooms 74-150, 74-152, 74-154, 74-159, 74-160, 74-161, 74-162, 74-212, 91-232, 91-233 | Room General Exhaust | Varies | 2013 |
| 283 | Rotoclone 2 | Rooms 74-205 – 74-209, 99-217 – 99-219 | Room General Exhaust | Varies | 1982 |
| 287 | Rotoclone 6* | Rooms BL209, BL211, BL214, BL304, BL306, BL307, BL309- BL314, BL316, BL402 – BL404, BL406-BL414, BL416 | Room General Exhaust | Varies | 1996 |
| 288 | Rotoclone 5* | Rooms BB101-BB103, BB106, BB108-BB111, BB113-BB118, BB201-BB203, BB206-BB208, BB210-BB217, BB303, BB312 | Room General Exhaust | Varies | 1996 |
| 291 | Rotoclone 7* | Rooms 85-205A – 85-208A, 99-105, 99-114 – 99-122, 99-209, ORG201A – ORG204A | Room General Exhaust | Varies | 1999 |
| 294 | Rotoclone 9* | Rooms BB112, 85-106, 85-108, 85-114, 85-115, 85-102, 85-104, 85-107, 85-110 | Room General Exhaust | Varies | 2003 |
| 295 | Rotoclone 10* | Rooms BL218, BL219 | Room General Exhaust | Varies | 2004 |

| 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, NEC445D, NEX445E, NEX445F, NEX445G | Room General Exhaust | Varies | 2005 |
| 319 | Rotoclone 2336* | Rooms NEX514, NEX516A-D, NEX522 -NEX524, NEX526, NEX528, NEX530, NEX535 - NEX538 | Room General Exhaust | Varies | 2005 |
| 320 | Rotoclone 2337* | Rooms NEX503, NEX505, NEX507, NEX509, NEX511, NEX513 | Room General Exhaust | Varies | 2005 |
| 321 | Rotoclone 2338* | Rooms NEX506, NEX508, NEX510, NEX512, NEX515 | Room General Exhaust | Varies | 2005 |
| 322 | CC 17034* | Rooms 74-174, 74-175, 74-176, 74-177, 74-179, 74-179A, 74-180, 74-180A | Room General Exhaust | Varies | 2012 |
| 533 | CC 10024047* | 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 |
| 574; 10008085(2) | CC 3416; RTO* | 574 | Fluid Bed 3287 | Up to 250 Kg/Load | 2006 |

| Emission Point ID | Control Device | Emission Unit ID | Mylan ID & Emission Unit Description | Design Capacity | Year Installed/ Modified |
|---|---|---|---|---|---|
| 575; 10008085(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; 10008538(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 24410 | Up to 575 Kg/Load | 2016 |
| N/A | None | N/A | Class I or Class II CFC-containing Equipment Subject to 40 CFR Part 82 Subpart F | Varies | Varies |
| 10008085 | None | 10008085 | Regenerative Thermal Oxidation | 16.0 mmBtu/hr<br>3,070 lbs/hr | 2010 |
| 10008538 | None | 10008538 | Absorber | Up to 4,000 cfm | 2010 |
| 10007530 | None | 10007530 | Kohler 100 REZG Natural Gas Fired Emergency Generator | 162 bhp/1,800 rpm | 2010 |
| 10008594 | None | 10008594 | Kohler 100 REZG Natural Gas Fired Emergency Generator | 162 bhp/1,800 rpm | 2011 |
| 1053 | None | 1053 | 750 kW Detroit Diesel/MTU | 1,006 bhp/1800 rpm | 2011 |
| 1053 | None | 1053 | Diesel Fuel Tank | 2,100 Gallons | 2011 |
| 323 | CC 10023125* | Rooms 87-103 to 87-117 | Room General Exhaust | Varies | 2014 |
| 324 | CC 10030432* | Rooms 74-101 to 74-110 | Room General Exhaust | Varies | 2017 |

*Identifies pollution control equipment included in R13-2068T.
(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 |
|---|---|
| R13-2068U~~T~~ | ~~April 4, 2017~~ |
| 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 | **$PM_{10}$** | 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 | **$SO_2$** | 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 | | |
| **$mmft^3$/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]**

## 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

**If to the US EPA:**

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

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

3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
**[45CSR§30-8.]**

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
**[45CSR§30-5.3.e.]**

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
**[45CSR§30-5.1.c.3.A.]**

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

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

**[45CSR§30-5.1.c.3.C.]**

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
**[45CSR§30-5.1.c.3.B.]**

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

## 3.6. Compliance Plan

3.6.1. N/A

## 3.7. Permit Shield

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

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

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

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

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

### 4.1. Limitations and Standards

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

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

4.1.3. The maximum amount of natural gas to be burned by a single boiler 7, 8, 15 (Emission Unit IDs 007, 008, 010) shall not exceed 7,000 $ft^3$/hr or 61,320,000 $ft^3$/yr.
**[45CSR13, Permit No. R13-2068 (Condition 5.1.11.)]** *(007, 008, 010)*

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

| 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 (Conditions 5.1.5., 5.1.6. and 5.1.7.)]** *(007, 008, 010)*

4.1.5. The three (3) Bryan Steam Corporation boilers 2343, 2344 & 2345 (Emission Unit IDs 011, 012, & 013) shall combust only natural gas fuel. The maximum amount of natural gas consumed by each boiler shall not exceed 20,590 $ft^3$/hr and 180.4 million $ft^3$/yr.
**[45CSR13, Permit No. R13-2068 (Condition 5.1.12.)]** *(011, 012, 013)*

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

| Pollutant | Maximum Hourly Emissions per Boiler (lb/hr) | Maximum Annual Emissions per Boiler (tpy) |
|---|---|---|
| Carbon Monoxide | 4.07 | 17.84 |
| Nitrogen Oxides | 2.06 | 9.02 |
| $PM_{2.5}/PM_{10}/PM^{(1)}$ | 0.20* | 0.86 |
| Sulfur Dioxide | 0.02** | 0.05 |
| Volatile Organic Compounds | 0.21 | 0.92 |

(1) Including Condensables
*Compliance with this streamlined limit will assure compliance with 45CSR§2-4.1.b. and R13-2068 (Condition 5.1.3.).
**Compliance with this streamlined limit will assure compliance with 45CSR§10-3.3.f. and R13-2068 (Condition 5.1.4.).

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

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

| Pollutant | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (tpy) |
|---|---|---|
| Carbon Monoxide | 1.16 | 5.10 |
| Nitrogen Oxides | 0.59 | 2.58 |
| $PM_{2.5}/PM_{10}/PM^{(1)}$ | 0.06 | 0.24 |
| Sulfur Dioxide | 0.004 | 0.015 |
| Volatile Organic Compounds | 0.06 | 0.26 |

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

4.1.8. The maximum amount of natural gas to be burned by a single boiler 24524 (Emission Point ID #016) shall not exceed 6,000 $ft^3$/hr or 52,600,000 $ft^3$/yr.
**[45CSR13, Permit No. R13-2068 (Condition 5.1.10.)]** *(016)*

## 4.2. Monitoring Requirements

4.2.1. The facility shall monitor the amount of natural gas used and the hours of operation for Boilers 7, 8, 15, 2343, 2344, 2345, and 24524 (Emission Unit IDs 007, 008, 010, 011, 012, 013, and 016) on a monthly and yearly basis. To demonstrate compliance with the emission limits and natural gas usage limits, the permittee shall record for each boiler the monthly hours of operation, and the monthly fuel consumption.
**[45CSR16, 45CSR§2-8.3.c; 40 C.F.R. § 60.48c(g) (Subpart Dc); 45CSR13, Permit No. R13-2068 (Conditions 5.2.2., 5.2.3., and 5.4.1.)]** *(007, 008, 010, 011, 012, 013, and 016)*

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

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

## 4.3. Testing Requirements

4.3.1. Reserved.

## 4.4. Recordkeeping Requirements

4.4.1. A record of each visible emission check shall be maintained on site for five (5) years from the record creation date. Such record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
**[45CSR13, Permit No. R13-2068 (Condition 5.4.2.)]**

## 4.5. Reporting Requirements

4.5.1. See Section 3.5 Facility - Wide Reporting Requirements

## 4.6. Compliance Plan

4.6.1. None

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

### 5.1. Limitations and Standards

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

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

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

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

(1) Fluid Beds 473, 1222, 1855, 2181, 3287, 3620, 3704, 15982 (Emission Unit IDs 534, 536, 538, 572, 574, 575, 577, 581): 250 kg/load
(2) Fluid Beds 527, 1339, 1552, 2113, 2811, 3426, 3705, 4001, 7560, 16117, 24410 (Emission Unit IDs 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, 583): 575 kg/load

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

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

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

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

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

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

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

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

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

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

c. 26.46 lb/hr (as emitted from the absorber) each for Fluid Bed 2811 and 4001 (Emission Unit IDs 573 and 579) if venting exhaust to the absorber for the purpose of controlling VOC emissions.

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

5.1.5. Maximum total combined annual VOC emissions to the atmosphere from the Fluid Beds shall not exceed 74.0 tons/year.
**[45CSR13, Permit No. R13-2068 (Condition 6.1.5.)]**

## 5.2. Monitoring Requirements

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

a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacturer's recommendations concerning control device maintenance and performance.

b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.

c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.

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

5.2.2. Visible emissions monitoring shall be conducted initially at least once per month of operation 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 three months of operation~~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 once per three months of operation only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but not less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.
**[45CSR13, Permit No. R13-2068 (Conditions 6.2.1.); 45CSR§30-5.1.c]**

5.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 5.1.3.a., the permittee shall monitor and record the total dry material per load for each fluid bed. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each fluid bed is equal or less than the maximum load given under 5.1.3.a. or if the permittee is able to demonstrate that

the maximum loading based on product formulations is equal or less than the maximum load given under 5.1.3.a.
**[45CSR13, Permit No. R13-2068 (Conditions 6.2.3.)]**

5.2.4. For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 5.1.3.b., the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material into the fluid beds.
**[45CSR13, Permit No. R13-2068 (Conditions 6.2.4.)]**

5.2.5. For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 5.1.5, the permittee shall:

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580).

b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580) when each bed is and is not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.

c. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from all fluid beds by summing the following:

(1) The total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580).

(2) The total amount of VOCs in pounds used in Fluid Beds 473, 1855, 2181, 2811, 3287, 3620, 3426, 3704, 3705, 4001, 7560 (Emission Unit IDs 534, 538, and 572 – 580) when not venting exhaust to the RTO/Absorber (as applicable) for the purpose of controlling VOCs.

(3) The total amount of VOCs used in Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580) when venting exhaust to the RTO for the purpose of controlling VOCs.

(4) The total amount of VOCs used in Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs. Based on compliance with Requirement 11.1.2 of this permit, the permittee may apply a VOC destruction efficiency of 95% to the amount of VOCs used in Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) when venting exhaust to the Absorber for the purpose of controlling VOCs.

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

## 5.3. Testing Requirements

5.3.1. See Section 3.3.1.

## 5.4. Recordkeeping Requirements

5.4.1. The permittee shall maintain a record of all solvents used in the fluid beds and keep a copy of the associated MSDS/SDS to verify that the solvents did not contain any constituent HAPs.
**[45CSR13, Permit No. R13-2068 (Condition 6.4.2.)]**

5.4.2. Records of weekly inspections conducted on the cartridge collector shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.
**[45CSR13, Permit No. R13-2068 (Condition 6.4.1.)]**

## 5.5. Reporting Requirements

5.5.1. See Section 3.5 Facility - Wide Reporting Requirements

## 5.6. Compliance Plan

5.6.1. None

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

### 6.1. Limitations and Standards

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

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

| 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) |
| 324 | 1.11(4) |

(1) Based on a PWR of 1,000 lb/hr for a Type "a" source operation.
(2) Based on a PWR of 1,764 lb/hr for a Type "a" source operation.
(3)Based on a PWR of 964 lb/hr for a Type "a" source operation.
(4)Based on a PWR of 919 lb/hr for a Type "a" source operation.

Compliance with 45CSR§7-4.1 for emission points 287, 288, 291, 294, 295, 282, 296-300, and 305-324 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 aggregate particulate matter (PM) emissions to the atmosphere from Emission Points 282, 296-300, and 305-324, as emitted through the applicable control devices listed under Table 1.0, shall not exceed a maximum hourly emission rate of 1.08 pounds per hour (lb/hr) and 2.77 tons per year (tpy).
**[45CSR§7-4.1. and 45CSR13, Permit No. R13-2068 (Condition 7.1.6.)]** *Compliance with this streamlined limit will assure compliance with 45CSR§7-4.1.and Permit R13-2068 (Condition 7.1.2.).*

6.1.6. The Rotoclone control devices and cartridge collector servicing production rooms shall be designed to achieve a collection efficiency of 98% for particulate matter emissions.
**[45CSR13, Permit No. R13-2068 (Condition 7.1.4.)]**

6.1.7. The permittee shall maintain and operate low water supply pressure sensors with control panel alarms for each Rotoclone to ensure adequate water supply and flow rate to the Rotoclones at each emission point specified, in order to ensure proper operation of the Rotoclone.
**[45CSR13, Permit No. R13-2068 (Condition 7.1.7.)]**

## 6.2. Monitoring Requirements

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

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but not less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.
**[45CSR13, Permit No. R13-2068 (Conditions 7.2.1.); 45CSR§30-51.1.c]**

6.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 6.1.6, the permittee shall:

a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacturer's recommendations concerning control device maintenance and performance;

b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any; and

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

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

## 6.3. Testing Requirements

6.3.1. See Section 3.3.1.

## 6.4. Recordkeeping Requirements

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

6.4.2. Records of Rotoclone low water supply pressure sensor alarm shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each Rotoclone low water supply pressure sensor alarm.
**[45CSR13, Permit No. R13-2068 (Condition 7.4.2.)]**

## 6.5. Reporting Requirements

6.5.1. See Section 3.5 Facility - Wide Reporting Requirements

## 6.6. Compliance Plan

6.6.1. None

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

### 7.1. Limitations and Standards

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

7.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7. Based on the process weight rates for the Coating Pans (excluding Coating Pans 1390, 3853, 4549, 4027, 7552, 8421, ~~and~~ 23581, and 30426; Emission Unit ID No. 215, 241, 242, 243, 244, 245, ~~and~~ 246, and 247), 333 pounds per hour each, the corresponding allowable particulate matter emission rate is 0.4 pounds per hour each. Based on the process weight rates for Coating Pan 3853 (Emission Unit ID 243), 750 pounds per hour, the corresponding allowable particulate matter emission rate is 0.9 pounds per hour.
**[45CSR§7-4.1]** *(Coating Pans 169, 186, 217, 99, 3853; Emission Unit IDs 210, 220, 230, 240, 243)*

7.1.3. Particulate matter emissions from the Coating Pan, venting through a cartridge collector (Coating Pans 1390, 4549, 4027, 7552, 8421, ~~and~~ 23581, and 30426; Emission Unit IDs 215, 241, 242, 244, 245, 246, and 247) at Emission Point ID No. 215, 241, 242, 244, 245, ~~and~~ 246, and 247 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 | |
| 247 | 0.84 | |

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

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

a. 396.9 lb/hr for each coating pan unit if not venting exhaust to the RTO for the purpose of controlling VOC emissions.

b. 7.94 lb/hr (as emitted from the RTO) each for Coating Pans 7552, 8421, 23581, and 30426 (Emission Unit IDs 244, 245, 246, and 247) 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~~10.0 tons/year.
**[45CSR13, Permit No. R13-2068 (Condition 8.1.5.)]**

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

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

(1) Coating Pan 1390 (Emission Unit ID 215): 750 pound/load;
(2) Coating Pan 4549 (Emission Unit ID 241): 750 pound/load;
(3) Coating Pan 4027 (Emission Unit ID 242): 245 pound/load;
(4) Coating Pan 7552 (Emission Unit ID 244): 750 pound/load;
(5) Coating Pan 8421 (Emission Unit ID 245): 750 pound/load;
(6) Coating Pan 23581(Emission Unit ID 246): 750 pound/load~~.~~; and
(7) Coating Pan 30426 (Emission Unit ID 247): 750 pound/load.

b. The annual aggregate dry material loading of all coating pans shall not exceed 11,000,000 pounds on a rolling yearly total basis.

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

d. The solvent spray rate processed in coating pans 4549, 4027, 7552, 8421, 23581, and 30426 (Emission Unit IDs 241, 242, 244, 245, 246, and 247) shall not exceed 3,000 grams-VOC/minute in each coating pan.

e. No VOC-containing solvents shall be processed in coating pan 1390 (Emission Unit ID 215).

f. Coating Pans 7552, 8421, 23581, and 30426 (Emission Unit IDs 244, 245, 246, and 247) 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.

~~h. At any one time, a maximum of five (5) of the coating pans listed under 7.1.6(d) may utilize VOC-containing solvents in the production process. The permittee shall develop and maintain a written compliance procedure to ensure the facility meets this requirement.~~

**[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 of operation 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 three months of operation~~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 once per three months of operation only after three consecutive monthly readings in which no visible emissions are observed from the subject emission point.

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but no less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any

other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.
**[45CSR13, Permit No. R13-2068 (Condition 8.2.1.); 45CSR§30-5.1.c]**

7.2.2. For the purposes of demonstrating compliance with the minimum cartridge collection efficiency as given under 7.1.6.c, the permittee shall:

a. Install, maintain, and operate the cartridge collectors consistent with safety and good air pollution control practices for minimizing emissions, and shall follow all manufacture's recommendations concerning control device maintenance and performance.

b. Conduct a weekly visual inspection of the cartridge, cartridge connections, and dust hoppers of each cartridge collector, in order to ensure proper operation of cartridge collectors. Records shall be maintained on site for five (5) years from the record creation date. Records shall state the date and time of each cartridge collector inspection, the inspection results, and corrective actions taken, if any.

c. Either conduct representative performance testing, pursuant to the performance testing procedures as outlined under 3.3.1. of this permit, on the cartridge collectors to determine a minimum collection efficiency or produce a vendor guarantee stating that the cartridge collectors (or associated filters) will meet a minimum collection efficiency of 95%.

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

7.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 7.1.6.a., the permittee shall monitor and record the total dry material per load for each coating pan. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each coating pan is equal or less than the maximum load given under 7.1.6.a. or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 7.1.6.a.
**[45CSR13, Permit No. R13-2068 (Condition 8.2.3.)]**

7.2.4. For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 7.1.6.b., the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material loaded into the coating pans.
**[45CSR13, Permit No. R13-2068 (Condition 8.2.4.)]**

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

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans 7552, 8421, ~~and~~ 23581, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247).

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, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247) 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, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247).

(2) The total amount of VOCs in pounds used in Coating Pans 7552, 8421, ~~and~~ 23581, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247) 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, and 30426 (Emission Unit IDs 244, ~~-~~245, ~~and~~ 246, and 247) 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, 23581, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247) 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:

Emissions (lb/hr) = F x 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:

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.

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, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247); 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, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247); 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, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line.
**[45CSR13, Permit No. R13-2068 (Condition 9.1.7.)]**

8.1.8. The permittee shall conduct, at a minimum, an annual inspection of the RTO to ensure proper operation of the control device. The inspection shall include the burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork.
**[45CSR13, Permit No. R13-2068 (Condition 9.1.8.)]**

## 8.2. Monitoring Requirements

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

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

These visible emission checks shall be conducted in accordance with 40 CFR 60, Appendix A, Method 22 during periods of facility operation for a sufficient time interval, but no less than one (1) minute, to determine if the unit has visible emissions. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emissions condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions.
**[45CSR13, Permit No. R13-2068 (Condition 9.2.1.); 45CSR§30-5.1.c.]**

8.2.2. For the purposes of demonstrating compliance with maximum annual natural gas combustion rates set forth in 8.1.4.b, the permittee shall monitor and record the rolling twelve month total of natural gas combusted by the RTO.
**[45CSR13, Permit No. R13-2068 (Condition 9.2.2.)]**

8.2.3. For the purposes of demonstrating compliance with maximum solvent combustion rates set forth in 8.1.4.c, the permittee shall monitor and record the amount of solvent, in pounds, sent to the RTO from Fluid Beds 473, 1855, 2181, 3287, 3620, 3426, 3704, 3705, and 7560 (Emission Unit IDs 534, 538, 572, 574 – 578, and 580); Coating Pans 7552, 8421, ~~and~~ 23581, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line. The monthly and rolling ~~twelve month~~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, and 30426 (Emission Unit IDs 244, 245, ~~and~~ 246, and 247); Oven Dryers 19, 18 and 0021 (Emission Unit IDs 260, 261, and 264); and the coating line ~~s~~hall be summed and recorded.
**[45CSR13, Permit No. R13-2068 (Condition 9.2.3.)]**

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

a. RTO Combustion Chamber Temperature: Thermocouples, RTDs, or alternative methods/ instrumentation as appropriate for gas stream;

b. RTO Exhaust Flow Rate: Differential pressure flow device, fan motor ammeter, or other type of device that measures gas velocity or flow rate.

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

8.2.5. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all manufacturer's recommendations.
**[45CSR13, Permit No. R13-2068 (Condition 9.2.5.)]**

## 8.3. Testing Requirements

8.3.1. Within 60 days after achieving the maximum solvent combustion rate at which the RTO(s) are permitted to operate at, but not later than 180 days after initial startup, and at such times thereafter as may be required by the Secretary, the permittee shall conduct, or have conducted, a performance test on the RTO(s) to determine compliance with the CO and $NO_x$ 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, General Permit Registration G60-C035]**

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

| Pollutant | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (tpy) |
|---|---|---|
| **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, General Permit Registration G60-C035]**

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

| Pollutant | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (tpy) |
|---|---|---|
| CO | 5.79 | 1.45 |
| $NO_x$ | 10.58 | 2.65 |
| VOCs | 10.58 | 2.65 |

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

9.1.4. Emergency Generator 1053 shall not exceed a fuel oil sulfur content of 0.0015%.
*Compliance with this limit will ensure compliance with the less stringent limit of 0.05% in General Permit Registration G60-C035.*
**[45CSR16; 45CSR13, General Permit Registration G60-C035, 40CFR§60.4207(b)]**

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

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

### 9.2. Monitoring Requirements

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

## 9.3. Testing Requirements

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

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

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

## 9.4. Recordkeeping Requirements

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

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

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

## 9.5. Reporting Requirements

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

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

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

## 9.6. Compliance Plan

9.6.1. None

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

### 10.1. Limitations and Standards

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

a. 529.2 lb/hr for each Oven Dryer if not venting exhaust to the RTO for the purpose of controlling VOC emissions.

b. 10.59 lb/hr (as emitted from the RTO) for each Oven Dryer~~s~~ if venting exhaust to the RTO for the purpose of controlling VOC emissions.

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

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

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

a. Each Oven Dryer~~s~~ shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere; and

b. No HAP-containing solvents shall be processed in any Oven Dryer.

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

### 10.2. Monitoring Requirements

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

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when each Oven Dryer is and is not venting exhaust to the RTO for the purpose of controlling VOCs; and

b. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) by summing the following:

i. The total amount of VOCs in pounds used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when not venting exhaust to the RTO for the purpose of controlling VOCs; and

ii. The total amount of VOCs used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC destruction efficiency of 98% to the amount of VOCs used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264) when venting exhaust to the RTO for the purpose of controlling VOCs.

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

## 10.3. Testing Requirements

10.3.1. See Section 3.3.1.

## 10.4. Recordkeeping Requirements

10.4.1. The permittee shall maintain a record of all solvents used in Oven Dryers 19, 18, 0021 (Emission Unit IDs 260, 261, and 264)and keep a copy of the associated MSDS to verify that the solvents did not contain any constituent HAPs.
**[45CSR13, Permit No. R13-2068 (Condition 10.4.1.)]**

## 10.5. Reporting Requirements

10.5.1. See Section 3.5 Facility - Wide Reporting Requirements

## 10.6. Compliance Plan

10.6.1. None

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

### 11.1. Limitations and Standards

11.1.1. The absorber shall, at all times when Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 95%.
**[45CSR13, Permit No. R13-2068 (Condition 11.1.1.)]**

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

a. Minimum Water Flow

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

11.1.3. The permittee shall maintain and operate low water flow rate sensors with control panel alarms for the absorber to ensure adequate water flow rate to the absorber in order to ensure proper operation of the absorber.
**[45CSR13, Permit No. R13-2068 (Condition 11.1.3.)]**

11.1.4. The permittee shall, to the extent reasonably possible, operate the absorber within the operating ranges as established under 11.1.2. at all times Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579) are venting exhaust to the absorber for the purpose of controlling VOCs. If an excursion from the operating ranges occurs, the permittee shall attempt to immediately correct the problem and follow the record-keeping procedures under 11.4.1. If the permittee is unable to correct the excursion in a timely fashion, for the purposes of emissions calculations under 5.2.5.c, a VOC destruction efficiency of 95% may not be assumed for the duration of the venting of VOC from Fluid Beds 2811 and 4001 (Emission Unit IDs 573 and 579).
**[45CSR13, Permit No. R13-2068 (Condition 11.1.4.)]**

11.1.5. The permittee shall conduct, at a minimum, an annual inspection of the absorber to ensure proper operation of the control device. The inspection shall include the spray nozzles, fans, dampers, absorber shell, packing, and ductwork.
**[45CSR13, Permit No. R13-2068 (Condition 11.1.5.)]**

### 11.2. Monitoring Requirements

11.2.1. For the purposes of demonstrating compliance with the requirements set forth in 11.1.2., the permittee shall continuously monitor and record the absorber water flow rate
**[45CSR13, Permit No. R13-2068 (Condition 11.2.1.)]**

11.2.2. The permittee shall install, maintain, and operate all monitoring equipment required by this section in accordance with all manufacturer's recommendations.
**[45CSR13, Permit No. R13-2068 (Condition 11.2.2.)]**

### 11.3. Testing Requirements

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

## 11.4. Recordkeeping Requirements

11.4.1. The permittee shall record the date, duration, and any corrective action taken in the occurrence of an excursion of absorber operating parameters outside the ranges as established under 11.1.2. If corrective action was not successful in a timely fashion, the permittee shall record the amount of solvent sent to the absorber while the excursion occurred.
**[45CSR13, Permit No. R13-2068 (Condition 11.4.1.)]**

11.4.2. The permittee shall maintain records of Absorber low water flow rate alarms on site for five (5) years from the record creation date. The records shall state the date and time of each Absorber low water flow rate alarm and any corrective action taken.
**[45CSR13, Permit No. R13-2068 (Condition 11.4.2.)]**

11.4.3. The permittee shall meet all record-keeping requirements as applicable to the Absorber and given under section 3.4 of this permit.
**[45CSR13, Permit No. R13-2068 (Condition 11.4.3.)]**

## 11.5. Reporting Requirements

11.5.1. See Section 3.5 Facility - Wide Reporting Requirements

## 11.6. Compliance Plan

11.6.1. None

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

### 12.1. Limitations and Standards

12.1.1. Maximum hourly VOC/HAP emissions to the atmosphere from the Coating Line shall not exceed:

a. 7.0 lb/hr for the Coating Line if not venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions; and

b. 0.14 lb/hr (as emitted from the RTO) for the Coating Line if venting exhaust to the RTO for the purpose of controlling VOC/HAP emissions.

**[45CSR13, Permit No. R13-2068 (Condition 12.1.1.)]**

12.1.2. The maximum annual VOC/HAP emissions to the atmosphere from Coating Line shall not exceed 3.0 tons/year.

**[45CSR13, Permit No. R13-2068 (Condition 12.1.2.)]**

12.1.3. The Coating Line shall have the capability of directing exhaust to RTO for control of VOC/HAPs or emitting directly to atmosphere.

**[45CSR13, Permit No. R13-2068 (Condition 12.1.3.)]**

### 12.2. Monitoring Requirements

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

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOC/HAPs in pounds used in the Coating Line when it is and is not venting exhaust to the RTO for the purpose of controlling VOC/HAPs; and

b. Calculate and record the monthly and rolling twelve month aggregate VOC/HAPs emissions from the Coating Line by summing the following:

(1) The total amount of VOC/HAPs in pounds used in the Coating Line when not venting exhaust to the RTO for the purpose of controlling VOCs; and

(2) The total amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOCs. Based on compliance with Requirement 8.1.7 of this permit, the permittee may apply a VOC/HAPs destruction efficiency of 98% to the amount of VOC/HAPs used in the Coating Line when venting exhaust to the RTO for the purpose of controlling VOC/HAPs.

**[45CSR13, Permit No. R13-2068 (Condition 12.2.1.)]**

### 12.3. Testing Requirements

12.3.1. See Section 3.3 Facility - Wide Testing Requirements

## 12.4. Recordkeeping Requirements

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

## 12.5. Reporting Requirements

12.5.1. See Section 3.5 Facility - Wide Reporting Requirements

## 12.6. Compliance Plan

12.6.1. None

# Attachment A: Class II General Permit G60-C

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION

**Appendix 3**

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

# Appendix 3 – PSD Applicability Review

**R14 PSD Applicability Review**

Mylan Pharmaceuticals Inc. (Mylan) is adding a new dust collector as part of this permit application. This equipment is being added to provide additional exhaust air for production rooms. The following table outlines increases in Particulate Matter (PM) and Volatile Organic Compound (VOC) emissions based on the past 5 years of permit applications:

| Permit Name | Application Date | Increase in VOC | Increase in PM | Description of Changes |
|---|---|---|---|---|
| R13-2068O | June 2011 | 0 tons | 0 tons | • Modifications to RTO, Absorber, and Fluid Bed maximum load information. |
| R13-2068P | July 2013 | -20 tons | -0.31 tons | • The addition of a cartridge collector to control particulate matter emissions from production rooms,<br>• The replacement of an existing rotoclone with a new rotoclone,<br>• The addition of a pilot coating line for research and development,<br>• PM limit decrease for coating pans,<br>• VOC limit decrease for fluid beds, and<br>• The addition of a new oven dryer (replaces an existing oven dryer). |
| R13-2068Q | July 2014 | 0 tons | 0.43 tons | • The addition of a cartridge collector to control particulate matter emissions from production room general exhaust. This replaces existing HEPA filter units inside the room. |
| R13-2068R | September 2015 | 0 tons | 0 tons | • The addition of a coating pan and associated dust collector to the facility. |
| R13-2068S | June 2016 | 0 tons | 0.33 tons | • The addition of a fluid bed and associated dust collector to the facility,<br>• The addition of a boiler, and<br>• The replacement of a similar cartridge type dust collector for a fluid bed.<br>• The replacement of similar cartridge type dust collectors for two coating pans. |
| R13-2068T | February 2017 | 0 tons | 0.58 tons | • The addition of a cartridge collector to control particulate matter emissions from production room general exhaust<br>• The addition of a coating pan and associated dust collector to the facility. |
| R13-2068U | June 2017 | 5.0 tons | 0 tons | • VOC limit increase for existing coating pans<br>• VOC capability for existing fluid bed |

Based on a minor increase of particulate matter and VOC, 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.