west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

November 3, 2015

CERTIFIED MAIL
91 7199 9991 7034 1380 3328

Mr. Scott Denicourt, GM and VP, Morgantown Operations
Mylan Pharmaceuticals Inc.
PO Box 4310
Morgantown, WV 26504-4310

Re: **Permit Issuance**
Mylan Pharmaceuticals Inc.
Chestnut Ridge Facility
Permit Number R13-2068R
Plant ID No. 061-00033

Dear Mr. Denicourt:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-2068R is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

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.

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. Should you have any questions or comments, please contact me at (304) 926-0499, extension 1219.

Sincerely,

Joe Kessler, PE
Engineer

Enclosures

West Virginia Department of Environmental Protection

Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit for Modification

R13-2068R

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

Issued to:

Mylan Pharmaceuticals Inc.
Chestnut Ridge Facility
061-00033

William F. Durham
Director

Issued: November 3, 2015

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

Facility Location:	Morgantown, Monongalia County, West Virginia
Mailing Address:	781 Chestnut Ridge Road, Morgantown, WV 26504
Facility Description:	Pharmaceutical Manufacturing Facility
NAICS Codes:	325412
UTM Coordinates:	589.6 km Easting • 4,390.1 km Northing • Zone 17
Latitude/Longitude:	39.65913/-79.95824
Permit Type:	Modification
Description of Change:	Installation of a new coating pan (246) and an associated cartridge collector (CC246).

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

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

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1.0. Emission Units

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

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

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device[1]
Rooms NEX435 - NEX438, NEX413 - NEX416, NEX419	315	Room General Exhaust	2005	Varies	Rotoclone 2332
Rooms NEX464 - NEX467, NEX481, NEX482, NEX484 - NEX492	316	Room General Exhaust	2005	Varies	Rotoclone 2333
Rooms NEX305-NEX312, NEX316	317	Room General Exhaust	2005	Varies	Rotoclone 2334
Rooms NEX445B, NEX445C, NEX445D, NEX445E, NEX445F, NEX445G	318	Room General Exhaust	2005	Varies	Rotoclone 2335
Rooms NEX514, NEX516A-D, NEX522 -NEX524, NEX526, NEX528, NEX530, NEX535 - NEX538	319	Room General Exhaust	2005	Varies	Rotoclone 2336
Rooms NEX503, NEX505, NEX507, NEX509, NEX511, NEX513	320	Room General Exhaust	2005	Varies	Rotoclone 2337
Rooms NEX506, NEX508, NEX510, NEX512, NEX 515	321	Room General Exhaust	2005	Varies	Rotoclone 2338
Rooms 74-174, 74-175, 74-176, 74-177, 74-179, 74-179A, 74-180, 74-180A	322	Room General Exhaust	2012	Varies	CC 17034
Rooms 74-150, 74-152, 74-154, 74-159, 74-160, 74-161, 74-162, 74-212, 91-232, 91-233	282	Room General Exhaust	2013	Varies	Rotoclone 3798
Rooms 87-103 to 87-117	323	Room General Exhaust	2014	Varies	CC 10023125
533	533	Fluid Bed 527	1991	Up to 575 Kg/Load	CC EF527
534	534, 10008085[2]	Fluid Bed 473	1997	Up to 250 Kg/Load	CC EF473; RTO
535	535	Fluid Bed 1339	1997	Up to 575 Kg/Load	CC EF1339
536	536	Fluid Bed 1222	1997	Up to 250 Kg/Load	CC EF1222
537	537	Fluid Bed 1552	1997	Up to 575 Kg/Load	CC EF1552

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device[1]
538	538, 10008085[2]	Fluid Bed 1855	2002	Up to 250 Kg/Load	CC EF2113; RTO
571	571	Fluid Bed 2113	2004	Up to 575 Kg/Load	CC EF2113
572	572, 10008085[2]	Fluid Bed 2181	2004	Up to 250 Kg/Load	CC EF2181; RTO
573	573, 10008538[2]	Fluid Bed 2811	2006	Up to 575 Kg/Load	CC 3340; Absorber
574	574, 10008085[2]	Fluid Bed 3287	2006	Up to 250 Kg/Load	CC 3416; RTO
575	575, 10008085[2]	Fluid Bed 3620	2007	Up to 250 Kg/Load	CC 3643; RTO
576	576, 10008085[2]	Fluid Bed 3426	2007	Up to 575 Kg/Load	CC 3407; RTO
577	577, 10008085[2]	Fluid Bed 3704	2008	Up to 250 Kg/Load	CC 3881; RTO
578	578, 10008085[2]	Fluid Bed 3705	2008	Up to 575 Kg/Load	CC 3879; RTO
579	579, 10008538[2]	Fluid Bed 4001	2008	Up to 575 Kg/Load	CC 4287; Absorber
580	580, 10008085[2]	Fluid Bed 7560	2010	Up to 575 Kg/Load	CC 10007482; RTO
581	581	Fluid Bed 15982	2011	Up to 250 Kg/Load	CC 15982
582	582	Fluid Bed 16117	2011	Up to 575 Kg/Load	CC 16117
215	215	Coating Pan 1390	1999	750 lbs/load	CC EF1390
241	241	Coating Pan 4549	2009	750 lbs/load	CC EF4553
242	242	Coating Pan 4027	2008	245 lbs/load	CC EF4101
244	244, 10008085[2]	Coating Pan 7552	2010	750 lbs/load	CC EF7674; RTO
245	245, 10008085[2]	Coating Pan 8421	2010	750 lbs/load	CC 8422; RTO
246	246, 10008085[2]	Coating Pan 246	2015	750 lbs/load	CC 246; RTO
260	260, 10008085[2]	Oven 19	<1973	Electric, Load Varies	RTO

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device[1]
261	261, 10008085[2]	Oven 18	<1973	Electric, Load Varies	RTO
264	264, 10008085[2]	Oven 0021	2013	Electric, Load Varies	RTO
1911	1911, 10008085[2]	Coating Line 1911	2014	10.77 lb/hr	RTO
10008085	10008085	Regenerative Thermal Oxidation	2010	16.0 mmBtu/hr 3,070 lbs/hr	None
10008538	10008538	Absorber	2010	4,000 cfm	None

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

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

2.0. General Conditions

2.1. Definitions

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

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

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

2.2. Acronyms

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

2.3. Authority

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

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

2.4. Term and Renewal

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

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2068 through R13-2068K, R13-2068M through R13-2068Q, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and -10.3.]

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

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

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

2.6. Duty to Provide Information

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

2.7. Duty to Supplement and Correct Information

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

2.8. Administrative Update

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

2.9. Permit Modification

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

2.10 Major Permit Modification

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

2.11. Inspection and Entry

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

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

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

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

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

2.12. Emergency

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

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

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

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

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

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

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

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

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

2.13. Need to Halt or Reduce Activity Not a Defense

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

2.14. Suspension of Activities

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

2.15. Property Rights

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

2.16. Severability

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

2.17. Transferability

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

2.18. Notification Requirements

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

2.19. Credible Evidence

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

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

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

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

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

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

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

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

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

3.2. Monitoring Requirements

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

3.3. Testing Requirements

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

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

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

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

[WV Code § 22-5-4(a)(15)]

3.4. Recordkeeping Requirements

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

computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

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

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

3.5. Reporting Requirements

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

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

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

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

3.5.4. Operating Fee

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

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based

upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

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

4.1. Limitations and Standards

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

4.2. Recordkeeping Requirements

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

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

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

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

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

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

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

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

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

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

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

5.1. Limitations and Standards

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

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

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

Table 5.1.3.: Fuel Burning Unit 45CSR2 PM Limits

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

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

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

Table 5.1.4.: Fuel Burning Unit 45CSR10 SO_2 Limits

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

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

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

Table 5.1.5.: Boiler 007 Emission Limits

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

(1) Including Condensables

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

Table 5.1.6.: Boiler 008 Emission Limits

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

(1) Including Condensables

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

Table 5.1.7.: Boiler 015 Emission Limits

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

(1) Including Condensables

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

Table 5.1.8.: Boiler 2343-2345 Emission Limits

Pollutant	Maximum Hourly Emissions per Boiler (lb/hr)	Maximum Annual Emissions per Boiler (tpy)
CO	4.07	17.84
NO_x	2.06	9.02
$PM_{2.5}/PM_{10}/PM^{(1)}$	0.20	0.86
SO_2	0.02	0.05
VOCs	0.21	0.92

(1) Including Condensables

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

5.1.10. The three (3) Bryan Steam Corporation boilers (Emission Points ID # 011, 012 & 013) shall combust only natural gas fuel. The maximum amount of natural gas consumed by each boiler shall not exceed 20,590 cubic feet per hour (cfh) and 180.4 million cubic feet per year (mmcfy).

5.2. Monitoring Requirements

5.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with the opacity standards of 45CSR2-3.1. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A. *(007, 008, 010, 011, 012, & 013)*

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

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

5.3. Testing Requirements

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

5.4. Recordkeeping Requirements

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

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

5.5. Reporting Requirements

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

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

6.1. Limitations and Standards

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

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

Table 6.1.2.: Fluid Bed 45CSR7 Individual Emission Limit

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

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

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

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

a. 529.2 lb/hr for each fluid bed if not venting exhaust to the RTO or absorber for the purpose of controlling VOC emissions;

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

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

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

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

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

(1) Fluid Beds 534, 536, 538, 572, 574, 575, 577, 581: 250 kg/load
(2) Fluid Beds 533, 535, 537, 571, 573, 576, 578, 579, 580, 582: 575 kg/load

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

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

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

e. Fluid Beds 534, 538, 572, 574 – 578, and 580 shall have the capability of directing exhaust to the RTO for control of VOCs or emitting directly to atmosphere;

f. Fluid Beds 573 and 579 shall have the capability of directing exhaust to the absorber for control of VOCs or emitting directly to atmosphere; and

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

6.2. Monitoring Requirements

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

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

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

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

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

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

6.2.3. For the purposes of demonstrating compliance with maximum dry material loading set forth in 6.1.6(a), the permittee shall monitor and record the total dry material per load for each fluid bed. This requirement may be waived if the permittee is able to demonstrate that the maximum

reasonable design capacity of each fluid bed is equal or less than the maximum load given under 6.1.6(a) or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 6.1.6(a).

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

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

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each fluid bed with the exception of Fluid Beds 534, 538, and 572 – 580.

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

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

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

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

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

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

6.3. Testing Requirements

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

6.4. Recordkeeping Requirements

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

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

6.5. Reporting Requirements

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

7.0. Source-Specific Requirements [Production Rooms]

7.1. Limitations and Standards

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

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

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

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

(1) Based on a PWR of 1,000 lb/hr for a Type "a" source operation.
(2) Based on a PWR of 1,764 lb/hr for a Type "a" source operation.
(3) Based on a PWR of 964 lb/hr for a Type "a" source operation.

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

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

Table 7.1.3.: Rotoclone Emission Limits

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

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

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

7.1.6. Maximum particulate matter (PM) emissions to the atmosphere from Emission Points 282, 296-300, and 305-323, as emitted through the applicable control devices listed under Table 1.0, shall not exceed a maximum hourly emission rate of 0.90 pounds per hour (lb/hr) and 2.19 tons per year (tpy).

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

7.2. Monitoring Requirements

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

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

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

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

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

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

7.3. Testing Requirements

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

7.4. Recordkeeping Requirements

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

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

7.5. Reporting Requirements

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

8.0. Source-Specific Requirements [Coating Pans 215, 241, 242, 244, 245, 246]

8.1. Limitations and Standards

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

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

Table 8.1.2.: Coating Pans 45CSR7 Emission Limits

Emission Unit	PM Emission Limit (lb/hr)
215	0.90
241	0.90
242	0.29
244	0.90
245	0.90
246	0.90

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

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

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

Emission Unit	$PM_{2.5}/PM_{10}/PM$ Emission Limit	
	Pound/hour	ton/year
215	0.84	6.25
241	0.84	
242	0.28	
244	0.84	
245	0.84	
246	0.84	

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

a. 396.9 lb/hr for each coating pan unit if not venting exhaust to the RTO for the purpose of controlling VOC emissions.

b. 7.94 lb/hr (as emitted from the RTO) each for Coating Pans 244, 245, and 246 if venting exhaust to the RTO for the purpose of controlling VOC emissions.

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

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

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

(1) Coating Pan 215: 750 pound/load;
(2) Coating Pan 241: 750 pound/load;
(3) Coating Pan 242: 245 pound/load;
(4) Coating Pan 244: 750 pound/load;
(5) Coating Pan 245: 750 pound/load; and
(6) Coating Pan 246: 750 pound/load.

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

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

d. The solvent spray rate processed in coating pans 241, 242, 244, 245, and 246 shall not exceed 3,000 grams-VOC/minute in each coating pan;

e. No VOC-containing solvents shall be processed in coating pan 215;

f. Coating Pans 244, 245, and 246 shall have the capability of directing exhaust to RTO for control of VOCs or emitting directly to atmosphere; and

g. No HAP-containing solvents shall be processed in any coating pan.

8.2. Monitoring Requirements

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

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

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

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

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

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

8.2.3 For the purposes of demonstrating compliance with maximum dry material loading set forth in 8.1.6(a), the permittee shall monitor and record the total dry material per load for each coating pan. This requirement may be waived if the permittee is able to demonstrate that the maximum reasonable design capacity of each coating pan is equal or less than the maximum load given under 8.1.6(a) or if the permittee is able to demonstrate that the maximum loading based on product formulations is equal or less than the maximum load given under 6.1.6(a).

8.2.4 For the purposes of demonstrating compliance with maximum annual aggregate dry material loading set forth in 8.1.6(b), the permittee shall monitor and record the aggregate monthly and rolling twelve month total amount of dry material loaded into the coating pans.

8.2.5 For the purposes of demonstrating compliance with maximum annual VOC emission limit set forth in 8.1.5, the permittee shall:

a. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in each coating pan with the exception of Coating Pans 244, 245, and 246.

b. Monitor and record the aggregate monthly and rolling twelve month total amount of VOCs in pounds used in Coating Pans 244, 245, and 246 when each coating pan is and is not venting exhaust to the RTO for the purpose of controlling VOCs.

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

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

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

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

8.3. Testing Requirements

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

8.4. Recordkeeping Requirements

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

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

8.5. Reporting Requirements

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

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

9.1. Limitations and Standards

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

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

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

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

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

[45CSR§6-4.1]

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

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

Table 9.1.3(a): RTO Emission Limits

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

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

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

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

b. The aggregate annual amount of natural gas consumed by the RTO(s) shall not exceed 140.16 million cubic feet per rolling twelve month total; and

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

9.1.5. The RTO shall, at all times when Fluid Beds 534, 538, 572, 574 – 578, and 580; Coating Pans 244, 245, and 246; Oven Dryers 260, 261, and 264; and the Coating Line are venting exhaust to the RTO for the purpose of controlling VOCs, achieve a minimum VOC destruction efficiency of 98%.

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

a. Minimum RTO Combustion Chamber Temperature; and

b. RTO Exhaust Flow Rate.

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

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

9.2. Monitoring Requirements

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

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

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

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

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

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

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

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

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

9.3. Testing Requirements

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

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

9.4. Recordkeeping Requirements

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

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

9.5 Reporting Requirements

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

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

10.1. Limitations and Standards

10.1.1. Maximum hourly volatile organic compound emissions to the atmosphere from Oven Dryers 260, 261, and 264 shall not exceed:

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

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

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

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

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

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

10.2. Monitoring Requirements

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

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

b. Calculate and record the monthly and rolling twelve month aggregate VOC emissions from Oven Dryers 260, 261, and 264 by summing the following:

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

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

of 98% to the amount of VOCs used in Oven Dryers 260, 261, and 264 when venting exhaust to the RTO for the purpose of controlling VOCs.

10.3. Testing Requirements

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

10.4. Recordkeeping Requirements

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

10.5. Reporting Requirements

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

11.0. Source-Specific Requirements [Absorber]

11.1. Limitations and Standards

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

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

a. Minimum Water Flow

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

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

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

11.2. Monitoring Requirements

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

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

11.3. Testing Requirements

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

11.4. Recordkeeping Requirements

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

11.4.2. The permittee shall maintain records of Absorber low water flow rate alarms on site for five (5) years form the record creation date. The records shall state the date and time of each Absorber low water flow rate alarm and any corrective action taken.

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

11.5. Reporting Requirements

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

12.0. Source-Specific Requirements [Coating Line]

12.1. Limitations and Standards

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

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

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

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

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

12.2. Monitoring Requirements

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

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

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

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

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

12.3. Testing Requirements

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

12.4. Recordkeeping Requirements

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

12.5. Reporting Requirements

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

CERTIFICATION OF DATA ACCURACY

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

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

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

Telephone No. _____ Fax No. _____

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[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.