

To: File  
From: John Legg  
Date: October 28, 2016

*John Legg*  
10/28/16

Subj: Class II Administrative Update to R13-2068R  
Mylan Pharmaceuticals, Inc. (Mylan)  
Chestnut Ridge Facility; Morgantown, Monongalia County, WV 26504  
Permit No: R13-2068S; Company ID: 061 - 00033

### Summary

This Class II Administrative Update is for:

- The addition of 2 new equipment pieces:
  - Fluid Bed 24410 (583; 583) <sup>(1)</sup> and associated New Cartridge type Dust Collector (CC 10024247).  
  
(1) (583; 583) - (Emission Point ID No.; Emission Unit ID No.)  
  
Note: The new fluid bed will not be connected to the Regenerative Thermal Oxidizer (RTO) and is not being permitted for VOC/solvent emissions.
  - Natural gas-fired (6.0 MM Btu/hr) Boiler 24524 (016; 016).
- The replacement of 3 old cartridge style dust collectors with 3 Cartridge Dust Collectors
  - New CC 10024047 (replacing old CC EF527) for existing Fluid Bed 527 (533; 533).
  - New CC 10024526 (replacing old CC EF7674) and New CC 10024525 (replacing old CC 8422) for 2 existing Coating Pans: 7552 (244; 244) and 8421 (245;245).

Potential emissions increases resulting from this update are estimate below. (See Table 1, at the end of this evaluation for additional information.)

2.58 ton/yr of NOx	-	from new Boiler 24524 (016; 016)
5.10 ton/yr of CO	-	from new Boiler 24524 (016; 016)
0.015 ton/yr of SO <sub>2</sub>	-	from new Boiler 24524 (016; 016)
0.26 ton/yr of VOC	-	from new Boiler 24524 (016; 016)
0.33 ton/yr of PM	-	from new Boiler 24524 (016; 016): 0.24 ton/yr and new Fluid Bed 24410 (583; 583): 0.09 ton/yr

## Timing

Given below are important dates for this administrative update:

- July 11, 2016 - the Division of Air Quality (DAQ) receives Mylan's permit application.
- July 12, 2016 - DAQ receives Mylan's \$300 application fee. Also, the writer is assigned as engineer.
- July 14, 2016 - Mylan's legal advertisement runs in the *Dominion Post*.
- July 21, 2016 - Mylan mails a copy of the newspaper affidavit of publication to DAQ.
- August 15, 2016 - DAQ issues an e-mail deeming the permit application complete.
- September 21, 2016 - This is the date the update should have been issued.
- October 18, 2016 - The writer emails Mylan asking if the company is going to assign numbered IDs for the new equipment tagged as TBD (To Be Determined).
- October 19, 2016 - Response to the writer's 10/18/16 email: Mylan will be assigning ID numbers for all new equipment tagged TBD. This is an internal asset ID number that is still pending issuance from our Quality department.
- October 21, 2016 - Mylan was sent the draft permit and a compare file comparing new version (R13-2068S) to previous version (R13-2068R). Mylan to send the DAQ the equipment final ID numbers to replace the place holding language "TBD" in the draft permit.
- October 24, 2016 - Mylan sends via email ID numbers for all new equipment tagged TBD.

## Process Description

The following information came from Attachment G in the permit application.

### Chestnut Ridge Road Facility Overview

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

release/loss of pharmaceutical ingredients to the atmosphere as air emissions of particulate matter.

### Fluid Bed

The purpose of this application is to install a new fluid bed at the site. This installation is part of a new project and is related to business demand and an increase in production rates. A cartridge style duct collector will be installed downstream of the fluid bed in the same setup that currently exists at the Chestnut Ridge facility for other fluid bed units.

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

### Boilers

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

### Coating Pans

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

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

## Regulatory Discussion

### Applicable Requirements

- 45CSR2 - "To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers"
- 2-3.1. Emission Source - [NEW Boiler](#) 24524 (016; 016)
- Applicability - 10% Maximum opacity from all smoke/PM boiler vent points.
- Compliance Demonstration - Quarterly visual observation and recordkeeping of visual observations.
- 45CSR7 - "To Prevent and Control Particulate Matter Air Pollution From Manufacturing Processes and Associated Operations"
- 7-3.1. Emission Source - [NEW Fluid Bed](#) 24410 (583; 583)
- Applicability - 20% maximum opacity from all PM-emitting vent points other than boiler vent points.
- Compliance Demonstration - Quarterly visual observation and recordkeeping of visual observations.
- 7-4.1. Emission Source - [NEW Fluid Bed](#) 24410 (583; 583)
- Applicability - PM emission limits from all PM-emitting vent points other than boiler vent points.
- Compliance Demonstration - Proper operation and maintenance of cartridge collectors.
- 45CSR13 - "Permits for Class II Administrative Update, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation."

Applicability - This application meets the requirements for a class II administrative update given in §45-13-4.2.b.

Compliance Demonstration - Mylan submitted permit application R13-2068S on July 11, 2016. The \$300.00 application fee was paid on July 12, 2016. The legal advertisement ran on July 14, 2016 in the *Dominion Post*. The application was deemed complete on July 21, 2016, the date the newspaper affidavit of publication arrived via email at the DAQ.

45CSR30 - "Requirements for Operating Permits"

Applicability - Mylan's Chestnut Ridge facility is a major Title V source having the potential to emit (PTE) 156.1 ton/yr of VOC.

Compliance Demonstration - Mylan has an operating permit (R30-06100033-2012) pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30. They submitted a renewal application in 2016.

Regulatory Requirements:

The same/no change for the [3 NEW Cartridge Dust Collectors](#) replacing of 3 old cartridge style dust collectors.

- [New CC 10024047](#) (replacing old CC EF 527) for existing Fluid Bed 527 (533; 533).
- [New CC 10024526](#) (replacing old CC EF7674) and [New CC 10024525](#) (replacing old CC 8422) for 2 existing Coating Pans: 7552 (244; 244) and 8421 (245;245).

Applicability - Replacement of existing dust collection units. No change to existing permit requirements.

Compliance Demonstration - No change to existing compliance demonstration.

### **Non-Applicable Requirements**

#### **45CSR16 - “Standards of Performance for New Stationary Sources”**

Emission Source - All Sources in proposed update:

Non-Applicability - No 40 CFR 60 NSPS regulation applies to the proposed modification.

#### **45CSR27 - “To Prevent and Control the Emissions of Toxic Air Pollutants”**

Emission Source - All Sources in proposed the update:

Non-Applicability - The proposed update will not discharge any toxic air pollutant into the open air in excess of the amounts shown in Table A of 45CSR27.

#### **45CSR34 - “Emission Standards for Hazardous Air Pollutants”**

Emission Source - All Sources in proposed the update:

Non-Applicability - No 40 CFR 61 NESHAPS regulation applies to the proposed modification.

### **Changes Made to R13-2068R**

The changes made to the old permit (R13-2068R) because of this update are detailed in the file comparison which is given in Attachment 1 to this evaluation. The resulting/updated permit is R13-2068S.

### **Emissions Increase**

Potential emissions increases resulting from this Class II Administrative Update are summarized below in Table 1.

2.58 ton/yr of NOx; 5.10 ton/yr of CO; 0.015 ton/yr of SO2;  
 0.26 ton/yr of VOC; and 0.33 ton/yr of PM.

**Table 1: Potential to Emit (PTE) Resulting from Class II Administrative Update R13-2068S.**

Emission Source	Emission Point ID No.	Emission Unit ID No.	Control Device	Pollutant	Uncontrolled Emissions		Controlled Emissions	
					(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
New Fluid Bed 24410	583	583	New Cartridge Collector 10024247	PM	0.6	1.49	0.04	0.09 (New)
Existing Fluid Bed	533	533						
New Boiler 24524 (NG-fired; 6 MMBtu/hr)	016	016	N/A	PM	0.06	0.24	0.06	0.24 (New)
Existing Coating Pan	244	244	New Cartridge Collector 10024526	PM	16.88	41.78	0.84	6.25 ton/yr current limit in R13-2068R&S for Emission Units 215, 241,242, 244, 245 and 246
Existing Coating Pan	245	245						
Total				PM	17.54	43.51	0.94	6.58
New Boiler (NG-fired; 6 MMBtu/hr)	016	016	N/A	VOC	0.06	0.26	0.06	0.26 (New)
Coating Pan	244	244	10008085 Existing Regenerative Thermal Oxidizer (RTO)	VOC	396.9	<sup>(1)</sup> 249.94 (Calculated at 98% RTO Removal Efficiency)	7.94	5 ton/yr current Coating Pan Limit in R13-2068R&S
Coating Pan	245	245						
Total				VOC	396.96	<sup>(1)</sup> 250.2	8.00	5.26
New Boiler (NG-fired; 6 MMBtu/hr)	016	016	N/A	NOx	0.59	2.58	0.59	2.58 (New)
				CO	1.16	5.10	1.16	5.10 (New)
				SO2	0.004	0.015	0.004	0.015 (New)

(1) Calculated by the writer assuming a 98% VOC removal efficiency in the RTO.

**Attachment 1**

File Comparison

Comparing R13-2068S to R13-2068R

Mylan Pharmaceuticals, Inc. (Mylan)

Chestnut Ridge Facility (061-00033)

Morgantown, Monongalia County, WV 26504



This permit will supersede and replace Permit R13-2068R2068R issued on ~~September 29, 2014~~ November 03, 2015.

Facility Location: Morgantown, Monongalia County, West Virginia  
 Mailing Address: 781 Chestnut Ridge Road, Morgantown, WV 26504  
 Facility Description: Pharmaceutical Manufacturing Facility  
 NAICS Codes: 325412  
 UTM Coordinates: 589.6 km Easting • 4,390.1 km Northing • Zone 17  
 Latitude/Longitude: 39.65913/-79.95824  
 Permit Type: ~~Modification~~ Class II Administrative Update  
 Description of Change: ~~Installation~~ • The addition of ~~a~~2 new coating pan (246 equipment pieces:

- ~~Fluid Bed 24410 (583; 583) and an associated New Cartridge type Dust Collector (CC 10024247).~~

- ~~Natural gas-fired (6.0 MM Btu/hr) Boiler 24524 (016; 016).~~

• ~~The replacement of 3 old cartridge collector (CC246)-style dust collectors with 3 Cartridge Dust Collectors;~~

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

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

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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.

**1.0.1-0, Emission Units**

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

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device <sup>(1)</sup>
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 EF527100 24047
534	534, 10008085 <sup>(2)</sup>	Fluid Bed 473	1997	Up to 250 Kg/Load	CC EF473; RTO
535	535	Fluid Bed 1339	1997	Up to 575 Kg/Load	CC EF1339
536	536	Fluid Bed 1222	1997	Up to 250 Kg/Load	CC EF1222

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device <sup>(1)</sup>
537	537	Fluid Bed 1552	1997	Up to 575 Kg/Load	CC EF1552
538	538, 10008085 <sup>(2)</sup>	Fluid Bed 1855	2002	Up to 250 Kg/Load	CC EF2113; RTO
571	571	Fluid Bed 2113	2004	Up to 575 Kg/Load	CC EF2113
572	572, 10008085 <sup>(2)</sup>	Fluid Bed 2181	2004	Up to 250 Kg/Load	CC EF2181; RTO
573	573, 10008538 <sup>(2)</sup>	Fluid Bed 2811	2006	Up to 575 Kg/Load	CC 3340; Absorber
574	574, 10008085 <sup>(2)</sup>	Fluid Bed 3287	2006	Up to 250 Kg/Load	CC 3416; RTO
575	575, 10008085 <sup>(2)</sup>	Fluid Bed 3620	2007	Up to 250 Kg/Load	CC 3643; RTO
576	576, 10008085 <sup>(2)</sup>	Fluid Bed 3426	2007	Up to 575 Kg/Load	CC 3407; RTO
577	577, 10008085 <sup>(2)</sup>	Fluid Bed 3704	2008	Up to 250 Kg/Load	CC 3881; RTO
578	578, 10008085 <sup>(2)</sup>	Fluid Bed 3705	2008	Up to 575 Kg/Load	CC 3879; RTO
579	579, 10008538 <sup>(2)</sup>	Fluid Bed 4001	2008	Up to 575 Kg/Load	CC 4287; Absorber
580	580, 10008085 <sup>(2)</sup>	Fluid Bed 7560	2010	Up to 575 Kg/Load	CC 10007482; RTO
581	581	Fluid Bed 15982	2011	Up to 250 Kg/Load	CC 15982
582	582	Fluid Bed 16117	2011	Up to 575 Kg/Load	CC 16117
<u>583</u>	<u>583</u>	<u>Fluid Bed 24410</u>	<u>2016</u>	<u>Up to 575 Kg/Load</u>	<u>CC 10024247</u>
215	215	Coating Pan 1390	1999	750 lbs/load	CC EF1390
241	241	Coating Pan 4549	2009	750 lbs/load	CC EF4553
242	242	Coating Pan 4027	2008	245 lbs/load	CC EF4101
244	244, 10008085 <sup>(2)</sup>	Coating Pan 7552	2010	750 lbs/load	CC EF767410 024526; RTO

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device <sup>(1)</sup>
245	245, 10008085 <sup>(2)</sup>	Coating Pan 8421	2010	750 lbs/load	CC <del>842210024</del> 525; RTO
246	246, 10008085 <sup>(2)</sup>	Coating Pan <del>2462358</del>	2015	750 lbs/load	CC <del>24623583</del> RTO
260	260, 10008085 <sup>(2)</sup>	Oven 19	<1973	Electric, Load Varies	RTO
261	261, 10008085 <sup>(2)</sup>	Oven 18	<1973	Electric, Load Varies	RTO
264	264, 10008085 <sup>(2)</sup>	Oven 0021	2013	Electric, Load Varies	RTO
1911	1911, 10008085 <sup>(2)</sup>	Coating Line 1911	2014	10.77 lb/hr	RTO
10008085	10008085	Regenerative Thermal Oxidation	2010	16.0 mmBtu/hr 3,070 lbs/hr	None
10008538	10008538	Absorber	2010	4,000 cfm	None

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

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

### 2.3. 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~~2068R. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### 2.5. Duty to Comply

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

### 2.6. Duty to Provide Information

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

### 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 45CSR131**

West Virginia Department of Environmental Protection • Division of Air Quality

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<b>If to the DAQ:</b> Director WVDEP Division of Air Quality 601 57th Street Charleston, WV 25304-2345	<b>If to the US EPA:</b> 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
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### 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.

- 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 & 016]**

**5.1. Limitations and Standards**

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

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

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

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

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

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

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

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

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

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

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

(1) Including Condensables

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

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

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

(1) Including Condensables

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

**Table 5.1.7.: Boiler ~~015010~~ Emission Limits**

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

(1) Including Condensables

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

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

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

(1) Including Condensables

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

**Table 5.1.89.: Boiler 2343-2345 Emission Limits**

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

(1) Including Condensables

5.1.910. 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.

5.1.1012. The three (3) Bryan Steam Corporation boilers (Emission Points ID # 011, 012 & 013) shall combust only natural gas fuel. The maximum amount of natural gas consumed by each boiler shall not exceed 20,590 cubic feet per hour (cfh) and 180.4 million cubic feet per year (mmcfy).

**5.2. Monitoring Requirements**

5.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with the opacity standards of 45CSR2-3.1. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A. (007, 008, 010, 011, 012, & 013 & 016)

5.2.2. The facility shall monitor the amount of natural gas used on a monthly and yearly basis for Boilers 007, 008, 010, 011, 012, & 013 & 016.

5.2.3. The facility shall monitor the hours of operation on a monthly and yearly basis of the Boilers 007, 008, 010, 011, 012, & 013 & 016.

### 5.3. Testing Requirements

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

### 5.4. Recordkeeping Requirements

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

### 5.5. Reporting Requirements

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

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

### 6.1. 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)
<u>Size 60</u> 534, 536, 538, 572, 574, 575, 577, 581	0.46
<u>Size 300</u> 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, <u>583</u>	1.06

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

- 6.1.3. Maximum particulate matter emissions (PM<sub>2.5</sub>/PM<sub>10</sub>/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:
- 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;
  - 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
  - 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:
- 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:
    - Fluid Beds 534, 536, 538, 572, 574, 575, 577, 581: 250 kg/load
    - Fluid Beds 533, 535, 537, 571, 573, 576, 578, 579, 580, 582, 583: 575 kg/load
  - The annual aggregate dry material loading of all fluid beds shall not exceed 99,000,000 pounds on a rolling yearly total basis;
  - 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%;
  - The spray rate used in each fluid bed shall not exceed 4 kilograms-VOC/minute;
  - 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;
  - 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
  - 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

- 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) ~~(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.

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## 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