TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Tyco Healthcare Kendall (dba Covidien)
2010 International Speedway
DeLand, FL 32724-2010

Deland Manufacturing Facility

Facility ID No. 1270094

PROJECT

Project No. 1270094-016-AV
Application for Title V Air Operation Permit Revision
Project Name: Title V Air Operation Permit Revision

COUNTY

Volusia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

Revised on August 29, 2012

Prepared by Natrevia Gradney-Mitchell, E.I.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. <u>Project Description:</u>

A. Applicant:

Mr. Mike Dini, Plant Engineering Manager
Tyco Healthcare Kendall (dba Covidien)
2010 International Speedway
DeLand, FL 32724-2010

B. Professional Engineer:

Ms. Suzanne Thomas-Cole, P.E.
AECOM
10 Patewood Drive, Bldg. 5, Suite 500
Greenville, SC 29615

C. Project Location:

DeLand Manufacturing Facility
2010 International Speedway
Deland, FL 32724-2010

D. Project Summary:

This project is for the revision of Title V Air Operation Permit No. 1270094-013-AV to incorporate the terms and conditions of Major Source Air Construction Permit No. 1270094-014-AC.

E. Application Information:

Application Received and Complete on: 06/20/2012

II. PSD Applicability for Project

This project is not subject to PSD.

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Not exempt from general permitting requirements.
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Grinding operations are a source of particulate emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Facility is a source of VOCs.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Volusia County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably	N	There is no applicable source

Subject to:	Y/N	Comments
Available Control Technology (PM)		category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is a Title V major source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
PM	EU No. 009- Needle Manufacturing, including Medivative Machine		
	EU No. 010- Grinding Operations	7.54	
	Total	**7.54**	
VOC	EU No. 009- Needle Manufacturing, including Medivative Machine	74.52	
	EU No. 010- Grinding Operations	0.09	
	Total	**74.61**	**75.0**
Total HAP	EU No. 009- Needle Manufacturing, including Medivative Machine	59.44	
	EU No. 010- Grinding Operations		
	Total	**59.44**	**Less than 60.0**
Individual HAP (Hexane & Acrylic Acid)	EU No. 009- Needle Manufacturing, including Medivative Machine	56.28	
	EU No. 010- Grinding Operations		
	Total	**56.28**	**Less than 60.0**
VE	EU No. 009- Needle Manufacturing		20%

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
	EU No. 010- Grinding Operations		

V. Federal NSPS and/or NESHAP Provisions

A. Not applicable to this facility.

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to operate the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).