Title V Air Operation Permit **Revision**
Permit No. 1270094-016-AV

APPLICANT

The applicant for this project is Tyco Healthcare Kendall (dba Covidien). The applicant's responsible official and mailing address are:

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

FACILITY DESCRIPTION

The applicant operates the DeLand Manufacturing Facility, which is located at 2010 East International Speedway Boulevard, DeLand, Florida.

The facility consists of needle manufacturing operations that contain the following processes: needle lube mixing, grinding, needle assembly, sterilization, packaging, prototypical equipment testing, and medivative machine operations. The medivative machine produces adult and pediatric needle cartridges for a hand held administration system. The grinding area has a cyclone, wet scrubber, and Trimmer wet scrubber.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued **August 23, 2009**
Air Construction Permit issued **March 03, 2011**
Air Construction Permit Extension issued **December 30, 2011**
Application for a Title V Air Operation Permit Revision received **June 20, 2012**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

This is a 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. The following changes were made as part of this revision:

(1) Lower the allowable limits **from** 94 tpy of VOCs and less than 94 tpy of Total/Single HAPs **to** 75 tpy of VOCs and less than 60 tpy of Total/Single HAPs. Facility submitted updated PTE emission inventory on 08/28/2012.

(2) Removal of Specific Condition No. A.1., Permitted Capacity; the facility has demonstrated compliance with this condition pursuant to the Major Source Air Construction permit No. 1270094-014-AC. The facility will continue to demonstrate compliance through solvent usage and purchase records.

(3) Removal of Specific Condition No. A.5.a., Daily Recordkeeping Requirement; the facility has demonstrated compliance with this condition pursuant to the Major Source Air Construction permit No. 1270094-014-AC. The facility will continue to demonstrate compliance through monthly recordkeeping of solvent usage and purchase records.

CONCLUSION

This project revises Title V air operation permit No. 1270094-013-AV, which was issued on August 23, 2009. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.