

NOTICE OF AIR POLLUTION PERMIT

May 22, 2014

CERTIFIED MAIL: 7000 0600 0025 3505 9457
RETURN RECEIPT REQUESTED

ISSUED TO:

Mr. Tom Obermeier
Executive Director-Supply Chain Management
Noven Pharmaceuticals, Inc
11960 SW 144 Street
Miami, FL 33186

Permit Number: 0250616-016-AO
Issue Date: May 22, 2014
Expiration Date: October 18, 2015

Project: State of Florida Non-Title V Source Air Operation Permit Revision for the Noven Pharmaceuticals, Inc. Facility
Facility Description: Pharmaceutical Preparation Manufacturing Facility. [Major SIC Code 2834; NAICS Code 325412).
Location: 14500 SW 119 Ave, Miami, FL 33186 & 11960 SW 144 Street, Miami, FL 33186
Lat./Long: 25° 38' 02" N / 80° 23' 14" W.
UTM: Zone 17 East (km) 561.50 km, North (km) 2835.10 km

This is Permit Number 0250616-016-AO to operate an air pollution source issued by the **Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management pursuant to Chapter 24, Code of Miami-Dade County and Chapter 403.087, Florida Statutes (F.S.)**. This is a State Air Operating Permit authorizing the operation of the emissions units described in this permit.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the RER as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the RER the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.

STATEMENT OF BASIS:

This permit is issued under the provisions of **Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297**, and in conformance with all existing regulations of the FDEP and the RER rules. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the RER and made a part hereof and specifically described in this permit.

PERMIT CONTENTS:

- Part I -- Summary Information
- Part II -- Facility-Wide Specific Conditions
- Part III -- Emission Unit Specific Conditions
- Appendix A – General Conditions

PART I -- SUMMARY INFORMATION

This permit addresses the following air pollution emission unit(s):

Emissions Unit Number	Emissions Unit Description
001	Pharmaceutical Adhesive Coating Process – the “East Coater” with Glenro Recuperative Thermal Oxidizer
003	R & D Coater in Corporate Building
005	Pharmaceutical Adhesive Coating Process – the “West Coater” with Glenro REGENEX Regenerative Thermal Oxidizer
006	One (1) Pharmaceutical Adhesive Coating Process The “Daytrana Coaters” Coater #1 – Unit controlled by an Alliance Regenerative Thermal Oxidizer (RTO)
007	USGP (US Gel Patch) Coater controlled by One (1) Donaldson Torit Pulse-Jet Dust Collector.

Permitting Note: Emission Unit 003 is located at 11960 SW 144 Street. Units 001, 005, 006 and 007 are located at 14500 SW 119 Avenue.

SIGNIFICANT DATES:

Non-Title V Air Operation Permit Revision application received on March 26, 2014.
EPSAP Professional Engineer signature document & proper fee received on April 3, 2014

REGULATORY CLASSIFICATION

This facility is classified as a synthetic minor, Non-Title V source of air pollution.

PERMIT HISTORY:

Permit No.	Project Type Description	Issue Date	Exp Date
AC 13-231414	Initial Construction Permit	11/10/1993	10/05/1994
0250616-001-AO	Initial Operation Permit	03/13/1995	03/13/2000
0250616-002-AC	Addition of West Coater	10/20/1997	10/19/1998
0250616-003-AC	Re-location of Parkside Coater to facility	07/17/1998	07/16/1999
0250616-004-AO	(Withdrawn 04/26/2000)	N/A	N/A
0250616-005-AO	Incorporate All EUs into Operation Permit	09/22/2000	09/21/2005
0250616-006-AC	Construction of Thermal Oxidizer for West Coater	03/26/2003	03/25/2004
0250616-007-AF	Incorporate Terms of 006-AC into Operation Permit	08/26/2003	09/24/2005
0250616-008-AC	Installation of Daytrana Coaters & RTO	10/31/2005	08/01/2013
0250616-009-AO	Renewal of Operation Permit	09/15/2005	09/14/2010
0250616-010-AO	Incorporate Portion of 008-AC into Operation Permit	10/06/2006	09/14/2010
0250616-011-AO	Renewal of Operation Permit	10/19/2010	10/18/2015
0250616-012-AC	Installation of Coater & Dust Collector	07/16/2012	07/15/2013
0250616-013-AC	Replacement of RTO at East Coater	03/22/2013	03/21/2014
0250616-014-AO	Operation Permit Revision for Installation of Coater & Dust Collector	04/26/2013	10/18/2015
0250616-015-AC	Construction Permit Extension for 0250616-013-AC	01/16/2014	09/20/2014
0250616-016-AO	Current Project for Operation Permit Revision for replacement of RTO at East Coater	-	-

PART II -- FACILITY-WIDE SPECIFIC CONDITIONS

1.0 Administrative Requirements

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Miami-Dade County Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management located at 701 NW 1 Court, Suite 400, Miami, Florida 33136.
- 1.2 Citation Format: In this permit, references to **F.A.C. Rule 62-xxx** refer to rules promulgated under **Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.**
- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160 F.A.C.]
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state, or local permitting requirements or other regulations.

- 1.5 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.
- 1.6 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from the RER or other departments or agencies.
- 1.7 Renewal of This State Permit Required: An application for renewal of this air operating permit must be submitted to the RER, Air Quality Management **at least 60 days prior** to the expiration date of this permit. To apply for renewal of an operating permit, the applicant shall submit the appropriate application form in triplicate, the appropriate application fee, all required compliance test results, and such additional information as the RER may require by law.
[Rule 62-4.030, 62-4.050, and 62-4.220 F.A.C.]

Note that public notice may be required again at the time of renewal or revision of this permit if the facility or permit is materially changed from that described by this permit.
[Rule 62-210.350(4)(a) F.A.C.]

- 1.8 County Permit Renewal: A request for renewal of the Miami-Dade County annual air operating permit must be submitted annually to the RER Air Quality Management on the appropriate form, **by May 31st of each calendar year**, along with the appropriate Miami-Dade County permit fee.
[Chapter 24-18, Code of Miami-Dade County]

2.0 General Pollutant Emission Limiting Standards

- 2.1 Objectionable Odor Prohibited: No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.
[Rule 62-296.320(2) F.A.C.]
- 2.2 General Visible Emissions Standard: Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]
- 2.3 Volatile Organic Compounds/Organic Solvents Emissions:
No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the RER.
Such controls include the following:
- Tightly cover or close all VOC containers when they are not in use.
 - Tightly cover all open tanks, which contain VOC when they are not in use.
 - Maintain all pipes, valves, fittings, etc., which handle VOC in good operating condition.
 - Confine rags used with VOC to tightly closed, fireproof containers when not in use.
 - Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- [Rule 62-296.320(1) F.A.C.]
- 2.4 Unconfined Emissions of Particulate Matter:
No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
Reasonable precautions include the following:
- Paving and maintenance of roads, parking areas and yards.

- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.
- Substitution of powdery materials with granular or pelletized materials, where possible.

[Rule 62-296.320(4)(c) F.A.C.]

3.0 Operation Requirements

3.1 Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C.]

3.2 Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceeds two hours in any 24 hour period unless specifically authorized by the RER for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700 F.A.C.]

4.0 Compliance Testing Requirements

4.1 Test Notification: Unless otherwise specified in this permit, the RER, Air Quality Management shall be notified in writing of expected compliance test dates (when required) at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.
[Rule 62-297.310(7)(a) 9 F.A.C.]

4.2 Testing at Capacity: Compliance testing (when required) shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emission unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2) F.A.C.]

- 4.3 **Special Compliance Tests:** When the RER, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the RER.
[Rule 62-297.310(7)(b) F.A.C.]

5.0 Reporting and Record Keeping Requirements

- 5.1 **Report Excess Emissions:** In case of excess emissions resulting from malfunctions, each owner or operator shall notify the RER in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the RER.
[Rule 62-210.700(6) F.A.C.]
- 5.2 **Report Plant Operation Problems:** If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall immediately notify the RER. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with the FDEP and the RER rules.
[Rule 62-4.130 F.A.C.]
- 5.3 **Retain Records:** All records required by this permit shall be kept by the owner or operator and made available for the RER inspection for a minimum of three (3) years from the date of such records.
[Rule 62-4.160(14)(b) F.A.C.]
- 5.4 **Compliance Test Reports:** Compliance test reports (when required) shall be submitted to the RER Air Quality Management, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.
Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the RER to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F.A.C. Rule 297.310(8)(c):
- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - All measured and calculated data required to be determined by each applicable test procedure for each run.
 - The detailed calculations for one run that relate the collected data to the calculated emission rate.
 - The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
- [Rule 62-297.310(8)(a) &(b) F.A.C.]
- 5.5 **Annual Operating Report Required:** The Annual Operating Report (DEP Form 62-210.900(5)) shall be completed each year and submitted to the Miami-Dade County, RER, Air Quality Management Division office or submitted electronically to the Florida Department of Environmental Protection by April 1 of the following year.
[Rule 62-210.370(3) F.A.C.]

PART III -- EMISSION UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emission units:

Emissions Unit Number	Emissions Unit Description
001	<p>This facility manufactures transdermal patches utilizing a pharmaceutical adhesive coating process</p> <p>East Coater: The coating process is composed of a coating knife roller system and an oven, along with other ancillary equipment. An enclosure is in place in front of the oven designed to surround the coater and web. The captured VOC generated during this process are controlled by a Glenro Model No. 2120078 Recuperative Thermal Oxidizer (RCO) rated at 4,000 SCFM, 1,400° F operating temperature, 98% design destruction efficiency, and a maximum throughput rate of 77 lb/hr.</p>
003	<p>R & D Coater in the Corporate Building. No pollution control equipment is associated with this coater.</p>
005	<p>West Coater: The coating process is composed of a coating knife roller system and an oven along with other ancillary equipment. An enclosure is in place in front of the oven designed to surround the coater and web. The captured VOC generated during this process are controlled by a Glenro Regenerative Thermal Oxidizer (RTO), REGENEX Model 208 rated at 8000 SCFM, 1.1 MMBtu/hr of natural gas, 1600° F operating temperature, 95% design destruction efficiency, and a maximum throughput rate of 48 lb/hr</p>
006	<p>Daytrana Coaters:</p> <ul style="list-style-type: none"> - Coater #1 <p>The coating processes are each composed of a coating knife roller system and an oven, along with other ancillary equipment. An enclosure is in place in front of the oven designed to surround the coater and web. The captured VOC generated during these processes are controlled by an Alliance Regenerative Thermal Oxidizer, Kronus Model 212 rated at 12,000 scfm, 1.9 MMBtu/hr of natural gas, 1600° F operating temperature, and a 98% design destruction efficiency.</p>
007	<p>USGP (US Gel Patch) Coater:</p> <p>Coater Controlled by One (1) Pulse-Jet Dust Collector</p> <p>Manufacturer: Donaldson-Torit Model No.: DFO 3-6 Filter Type: Ultra Web cartridges Filter Efficiency: MERV 15 (95%) Filter Area: 1,140 ft² Air-to-Cloth Ratio 2.8 Capacity: 3,600 cfm Maximum SP: - 14 in WC</p>

Permitting Note: Emission Unit 003 is located at 11960 SW 144 Street. Units 001, 005, 006 and 007 are located at 14500 SW 119 Avenue.

1.0 This Permit supersedes previously issued Air Operation Permit 0250616-014-AO

2.0 Emissions Limiting Standards and Operation Restrictions

- 2.1 Facility-Wide Volatile Organic Compounds Emissions: Facility-wide total emissions of volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), shall not exceed 100 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 2.2 VOC Emissions Limiting Standards: No owner or operator of a fabric coating line or a vinyl coating line subject to Rule 62-296.504, F.A.C., may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.8 pounds per gallon of coating (0.46 kilograms per liter), excluding water, delivered to a coating applicator from a vinyl coating line.
[Rule 62-296.504(2)(a)2 F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 2.3 Vinyl Coating Emissions Limits: The permittee shall achieve the required emissions limiting standards under Rule 62-296.504(2) by:
a. The application of low solvent content coating technology; or
b. Incineration
[Rule 62-296.504(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 2.4 Facility-Wide Hazardous Air Pollutant (HAP) Emissions: Facility wide emissions of all hazardous air pollutants (HAPs) shall not equal or exceed 25 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 2.5 Facility-Wide Individual Hazardous Air Pollutant (HAP) Emissions: Facility wide total emissions of any individual HAP shall not equal or exceed 10 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 2.6 Allowable Fuel: Fuel burned shall be limited to natural gas.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]
- 2.7 Hours of Operation: The referenced emissions unit(s) may operate 24 hours/day, 7 days/week, 52 weeks/year resulting in 8,760 hours in any consecutive 12-month period.
Rule 62-210.200(PTE) and 62-4.070(3) F.A.C., and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 2.8 Visible Emissions (VE) {Emissions unit 001, 003, 005, 006}: Visible emissions shall not exceed 5% opacity except that visible emissions not exceeding 20% opacity are allowed for up to six (6) minutes in any one-hour period.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]
- 2.9 Visible Emissions (VE) {Emissions unit 007}: The permittee shall not cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the opacity of which is equal to or greater than 20%
[Rule 62-4.070(3) F.A.C. and Permit No. 0250616-012-AC]

- 2.10 Control Technology for Emissions Units 001, 005 & 006: The emissions limiting standards under Rule 62-296.504 F.A.C. shall be achieved by incineration, provided that 90 percent of the VOC (VOC measured as total combustible carbon) which enter the RTO are oxidized to carbon dioxide and water. [Rule 62-296.504(3)(b) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]
- 2.11 Operating Temperature: Whenever the coating line (under Emissions Unit 001 above) is in operation, the Thermal Oxidizer shall be on and a minimum operating temperature of 1400°F shall be maintained. [Rule 62-4.070(3) F.A.C.; 0250616-013-AC]
- 2.12 Operating Temperature: Whenever the coating line (under Emissions Unit 005 above) is in operation, the RTO shall be on and a minimum operating temperature of 1600°F shall be maintained. [Rule 62-4.070(3) F.A.C.]
- 2.13 Operating Temperature: Whenever the coating line (under Emissions Unit 006 above) is in operation, the RTO shall be on and a minimum operating temperature of 1600°F shall be maintained. [Rule 62-4.070(3) F.A.C. and Permit No. 0250616-008-AC]

3.0 Compliance Monitoring and Recordkeeping Requirements

- 3.1 Test Required and Frequency: The permittee shall test Emissions Units 001, 005 & 006 within sixty (60) days prior to the expiration of this permit for Visible Emissions, using EPA Method 9, and for Volatile Organic Compounds, using EPA Method 25 or 25.A [Rule 62-4.070(3) F.A.C; 62-297 F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]
- 3.2 Control Equipment: Since this facility employs a destructive control device to achieve the emissions limiting standard, prior to renewal of this operating permit, the permittee shall verify that the control systems meet the criteria for Permanent Total Enclosure or conduct VOC Capture Efficiency testing, in accordance with Rule 62-597.450 VOC Capture Efficiency Test Procedures. The capture efficiency of the “enclosure” shall be determined, including connecting ductwork to the thermal oxidizer. A test protocol shall be submitted to the RER at least thirty (30) days prior to the scheduled test date. If any physical or operational change is made to control/capture systems, the RER may require the permittee to conduct a new capture efficiency test. [Rule 62-297.440(7) F.A.C; Rule 62-297.450 F.A.C. and Permit Nos. 0250616-003-AC; 0250616-008-AC; 0250616-013-AC]
- 3.3 Permanent Total Enclosure Verification Method and Procedures (Emissions Units 001, 005 & 006): To demonstrate compliance with the criteria for Permanent Total Enclosure, the permittee shall verify that each of the following criteria is met using EPA Method 204
- (1) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the RER.
 - (2) The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure’s four walls, floor, and ceiling.
 - (3) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm). The direction of airflow through all NDOs shall be into the enclosure.
 - (4) All access doors and windows whose areas are not included in (2) above and are not included in the calculation in (3) above shall be closed during routine operation of the process.
 - (5) All VOC emissions must be captured and contained for discharge through a control device.
- [Rule 62-297.440(7) F.A.C; Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-008-AC; 0250616-013-AC]

3.4 Destruction Efficiency Test Methods and Procedures: To demonstrate compliance with the emissions limiting standards of this permit, the permittee shall conduct RTO destruction efficiency testing on Emissions Units 001, 005 & 006 within sixty (60) days prior to the submittal of an application for air operating permit renewal or revision. The compliance tests shall consist of the following test methods and procedures, shall meet all applicable requirements of Rule 62-297 F.A.C. and results shall be included with any required permit applications.

- a. RTO inlet and outlet gas concentrations shall be determined using EPA Method 25 or 25A of Attachment 3 of EPA 450/2-78-041, incorporated and adopted by reference in Chapter 62-297 F.A.C.
- b. VOC content of vinyl coatings shall be determined by obtaining and analyzing a representative sample of vinyl coatings used during the destruction efficiency tests in accordance with EPA Method 24 or 24A.
- c. The total amount of vinyl coatings, solvents, and all VOC-containing materials used during the compliance tests shall be documented.
- d. A report indicating the results of the required stack tests shall be filed with the RER no later than forty-five (45) days after the last sampling run is completed. The report shall provide sufficient detail on the tested emissions units (001, 005 & 006) and the procedures used to allow the RER to determine if the tests were properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information cited in Chapter 62-297.310(8). In addition, the test report shall include the following:

- (1) Destruction Efficiency Test: For each run and the three run average, determine the following
 - Destruction efficiency of VOC per hour to the RTO based on the following equation

$$\% \text{Destruction Efficiency} = \frac{(\text{VOC}_{\text{IN}} - \text{VOC}_{\text{OUT}}) \times 100\%}{(\text{VOC}_{\text{IN}})}$$

- Inlet pounds of VOC/HAP per hour to the RTO (VOC_{IN})
- Outlet pounds of VOC/HAP per hour from the RTO (VOC_{OUT})
- VOC process rate in pounds of VOC/HAP per hour
- Percent of permitted capacity
- Temperature ($^{\circ}\text{F}$) of the inlet to and the outlet from the RTO
- A general description of the condition of the control equipment to include the last date of thorough maintenance inspection, repairs made since last test, and changes to the equipment or processes made since the last test.

[Rule 62-296.504(4)(b)2 F.A.C; Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]

3.5 Non-destructive: The test method for VOCs shall be EPA VOC Capture Efficiency Test Procedures Rule 62-297.440(7) F.A.C. The sampling time for each capture efficiency test run shall be at least 8 hours, unless otherwise approved by the Florida Department of Environmental Protection (FDEP) pursuant to Rule 62-297.620 F.A.C.

[Rule 62-296.504(4)(b)2 F.A.C and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]

3.6 Alternate Procedure(s) Request: The permittee may obtain approval of alternate testing procedures according to items “a” through “f” below:

- a. Submit a request in writing for a determination by the FDEP Secretary of his/her designee that any requirement relating to emissions test procedures, methodology, equipment, or test facilities shall not apply to such emissions unit and request approval of an alternate procedure or requirements.
- b. The request shall set forth the following information, at a minimum:
 - 1) Specific emissions unit and permit number, if any for which exception is requested
 - 2) The specific provision(s) of this permit from which an exception is sought
 - 3) The basis for the exception, including but not limited to any hardship, which would result from compliance with the provisions of this permit.

- 4) The alternate procedure(s) or requirement(s) for which approval is sought and a demonstration that such alternate procedure(s) or requirement(s) shall be adequate to demonstrate compliance with applicable emissions limiting standards contained in the rules of the FDEP or any permit issued pursuant to those rules.
 - c. The Secretary or his/her designee shall specify by order each alternate procedure of requirement approved for an individual emissions unit source in accordance with 62-297.620 F.A.C. or shall issue an order denying the request for such approval. The FDEP order shall be final agency action, reviewable in accordance with Section 120.57, Florida Statutes.
 - d. The permittee shall submit such request in advance of the actual test date to allow sufficient time for FDEP to process such request.
 - e. The permittee shall submit copies of all such correspondence to the RER Air Quality Management Division only after FDEP approval has been obtained.
[Rule 62-297.620 F.A.C; Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]
- 3.7 **Modification:** If any physical or operational change is made to the control system, the permittee shall notify the RER Air Quality Management Division within ten (10) working days after making such change. The RER shall require the permittee of the affected activity, process, or emissions unit to conduct a new capture efficiency test if the RER has reason to believe that a physical or operational change made to the capture system has decreased the overall emissions reduction efficiency of the system.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-013-AC]
- 3.8 **Monitoring Equipment:** Monitoring equipment shall continuously monitor and record the Thermal Oxidizer chamber temperatures (Emissions Unit 001, 005, & 006). The permittee shall operate, maintain, and calibrate the monitoring equipment in accordance with the manufacturer's recommendations.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-008-AC; 0250616-013-AC]
- 4.0 **Reporting and Record Keeping Requirements**
- 4.1 **Test Report:** The report shall indicate the results of the tests in the same form and units of measure as the applicable emission standard. The VOC content of the adhesive, the process rate of the adhesive, the capture efficiencies of the enclosure and the thermal oxidizer destruction efficiency shall be used to determine the emission level of the coating operation in pounds of VOCs per gallon (kilograms per liter) of coating, excluding water, delivered to the coating applicator. The results of the tests and this calculation shall determine whether or not the facility is in compliance with the emissions limiting standards.

The facility shall, for the following parameters, indicate the normal operating conditions for the equipment, the actual operating conditions during each test run and the method of determination:
 - 1) Oxidizer temperature (F°)
 - 2) Process rate (gallons of adhesive per hour)
 - 3) Production rate (patches per hour)[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-008-AC; 0250616-013-AC]
- 4.2 **VOC Content and Emissions:** The permittee shall determine the VOC content of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
 - a. The VOC content for each material containing or emitting VOCs
 - b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s)

- c. The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and VOC content, calculated for the preceding month no later than 10 days after the end of that month
 - d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 4.3 HAP Content and Emissions: The permittee shall determine the total and individual HAP contents of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
- a. The individual and total HAP contents for each material containing or emitting HAPs
 - b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s)
 - c. The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content; calculated for the preceding month no later than 10 days after the end of that month
 - d. A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-006-AC; 0250616-008-AC; 0250616-012-AC; 0250616-013-AC]
- 4.4 RTO Temperatures: The permittee shall record and maintain records of the chamber temperatures from the monitoring equipment for all Thermal Oxidizers and they shall be made available to RER personnel for review upon request
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-008-AC; 0250616-013-AC]
- 4.5 Equipment Calibration: The permittee shall maintain the date, the name of the technician, and the procedures for performing the calibration on the continuous temperature monitoring system. Such records shall be kept in a maintenance log and made available to RER personnel for review upon request. Additionally, maintenance and repair activities on the Thermal Oxidizers shall be documented and included in the maintenance log.
[Rule 62-4.070(3) F.A.C. and Permit Nos. 0250616-008-AC; 0250616-013-AC]
- 4.6 Additional Record keeping and recycling: The permittee shall keep a log with a following information:
- a. The amount of chemicals manifested to recyclers, the manufacturer, or the dump.
 - b. A summary of any maintenance or repairs performed on the VOC capture system.
[Rule 62-4.070(3) F.A.C. and Permits Nos. 0250616-006-AC; 0250616-008-AC, 0250616-012-AC; 0250616-013-AC]

- 4.7 Supporting Documentation: The permittee shall maintain supporting documentation, such as Material Safety Data Sheets, purchase orders, usage and disposal records, etc., and shall include sufficient information to determine compliance.
[Rule 62-4.070(3) F.A.C. and permit Nos. 0250616-012-AC; 0250616-013-AC]

Executed in Miami-Dade County, Florida.

REGULATORY AND ECONOMIC RESOURCES

H. Patrick Wong, Chief
Air Quality Management

Date

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FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated RER Clerk, receipt of which is hereby acknowledged.

Clerk

Date