



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Catalent Pharma Solutions, LLC  
2725 Scherer Drive North  
St. Petersburg, FL 33716-1016

Facility ID No. 1030112

**PROJECT**

Project No. 1030112-031-AC  
Application for Minor Air Construction Permit  
Project Name: RTO Ventilation System Construction Modifications

**COUNTY**

Pinellas County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Air Resource Management  
Southwest District Office  
Temple Terrace, Florida 33637-7600

June 19, 2012

Prepared by Danny Stubbs

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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## 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. Project Description:

##### A. Applicant:

Ms. Dina Kostakis, General Manager  
Catalent Pharma Solutions, LLC  
2725 Scherer Drive North  
St. Petersburg, Florida 33716-1016

##### B. Professional Engineer:

Mr. Mitchell J. Hait, P.E., Ph.D.  
Mitchell J. Hait, Ph.D, P.E., Inc.  
404 Sebastian Square  
Saint Augustine, Florida 32095

##### C. Project Location:

The facility located at 2725 Scherer Drive North, Pinellas County

##### D. Project Summary:

This project modifies Emissions Unit No. 001 as follows:

- (1) A new Datron M10 ethanol cooled milling machine will be installed and will vent to the RTO. The Datron M10 will require ventilation duct work connecting to the RTO.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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- (2) Encapsulation machines 16, 20, 22 and 24 will be removed from the RTO ventilation system. These machines no longer use solvent for processing and therefore ventilation to the RTO is no longer necessary and will be removed.
- (3) The RTO ventilation duct located above the ceiling in room F0115 will be extended through the ceiling into the room. This duct will be used to connect a new spray washer that will be included in a future construction permit application.
- (4) The RTO ventilation duct in room F0114 will be repositioned to allow adequate space between the ventilation duct and wall. The modification will create a larger space for operators to walk by and will address safety concerns.
- (5) The naphtha vacuum still and associated equipment will be removed.
- (6) DRE testing of the RTO, which was triggered by the replacement of equipment vented to the RTO, was revised and based on the RTO maximum heat input rate. Consequently, the RTO Operation Restriction that limited the maximum number of machines venting to the RTO was also removed.

This project will not affect the facility-wide VOC, Individual HAP and Total HAPs limits.

E. Application Information:

Application Received on: June 5, 2012

Application Complete: June 5, 2012

II. Rule Applicability

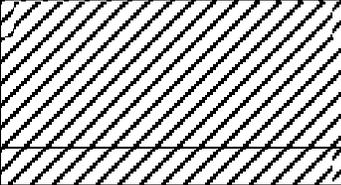
This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
<b>Rule 62-210.300, F.A.C.</b> - Permits Required	Y	Subject to general permitting requirements
<b>Rule 62-212.400, F.A.C.</b> - Prevention of Significant Deterioration	N	facility is not a PSD major source
<b>Rule 62-296.320(4), F.A.C.</b> - General Particulate Emission Limiting Standards	Y	operations could be a source of unconfined particulate matter emissions
<b>Rules 62-296.320(1) and (2), F.A.C.</b> - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	operations are a source of VOC and potential odors
<b>Rule 62-296.401-470, F.A.C.</b> - Stationary Source Emission Standards	N	there is no applicable source category
<b>Rule 62-296.500, F.A.C.</b> - Reasonably Available Control Technology (VOC)	N	there is no applicable source category
<b>Rule 62-296.700, F.A.C.</b> - Reasonably Available Control Technology (PM)	N	there is no applicable source category

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

<b>Subject to:</b>	<b>Y/N</b>	<b>Comments</b>
<b>Rule 62-204.800, F.A.C.</b> - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
<b>Rule 62-204.800, F.A.C.</b> National Emission Standard for Hazardous Air Pollutants (NESHAPS - 40 CFR 61)	N	there is no applicable source category
<b>Rule 62-204.800, F.A.C.</b> 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
<b>Chapter 62-213, F.A.C.</b> - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
<b>Rule 62-297.310, F.A.C.</b> - General Compliance Test Requirements, F.A.C.	Y	This project requires capture efficiency testing.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions ( tpy)	Allowable Emissions (tpy)
VOC	Total of All Regulated Emissions	95	95
Total HAP	Total of All Regulated Emissions	23.7	23.7
Individual HAP	Total of All Regulated Emissions	9.5	9.5
VE	006		20 % opacity except for one 6-minute period per hour during which opacity shall not exceed 27 percent.
	007		Same as E.U. No. 006

Note: VE opacity limits for EU No 006 and 007 are based on the Rule 62-296.406(1).

IV. 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.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### V. 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, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

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 construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).