Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T.
Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

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

Authorized Representative:
Ms. Dina Kostakis, General Manager

Air Permit No. 1030112-031-AC
Permit Expires: 8/30/2013
Minor Air Construction Permit
Project Name: RTO Ventilation System Construction Modifications

This is the final air construction permit for modifications to the regenerative thermal oxidizer (RTO) ventilation system (i.e., Emissions Unit No. 001) and for the removal of the existing naphtha vacuum still and its associated equipment. RTO modifications will include the addition of a new Datron M10 milling machine to the RTO ventilation system, the removal of several encapsulation machines from the RTO ventilation system and two minor modifications to the RTO ventilation duct. The proposed work will be conducted at the Catalent Pharma Solutions, LLC facility (Standard Industrial Classification No. 2834). The facility is located in Pinellas County at 2725 Scherer Drive North in St. Petersburg, Florida. The UTM coordinates are Zone 17, 335.3 km East, and 3085.7 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida,

32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Ms. Dina Kostakis, Catalent Pharma Solutions, LLC (Dina.Kostakis@Catalent.com)

Mr. Jeffery Rogers, Catalent Pharma Solutions, LLC (Jeffery.Rogers@Catalent.com)

Mr. Mitchell J. Hait, Mitchell J. Hait, Ph.D, P.E., Inc. (Haitinc@gmail.com)

Mr. Gary Robbins, Pinellas County Air Quality Division (grobbins@pinellascounty.org)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility is a pharmaceutical encapsulation facility that produces liquid filled soft gelatin capsules (Softgel). The existing facility consists of the following emissions units.

Facility ID No. 1030112	
ID No.	Emission Unit Description
001	Pharmaceutical Manufacturing Equipment Vented to RTO
003	Up to 14 Washtubs Used for Solvent Cleaning (VOC RACT)
005	Various VOC/OS/HAP emission activities
006	12.6 MMBTU/hour Boiler (North) (NSPS)
007	12.6 MMBTU/hour Boiler (South) (NSPS)

Project Description and Affected Emission Units

This project modifies Emission Unit ID 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.
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. This project will modify the following emissions unit.

Facility ID No. 1030112	
ID No.	Emission Unit Description
001	Pharmaceutical Manufacturing Equipment Vented to RTO

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

Department Exemptions – Rule 62-4.040, F.A.C.

- Six (6) Powder Weigh-Off Booths w/HEPA filters (Rule 62-4.040, F.A.C.)
- Two (2) Solvent Weigh-Off Booths w/carbon canister (Rule 62-4.040, F.A.C.)
- 1500-gallon Waste Oil Tank. (Rule 62-4.040, F.A.C.)
- Binks Sames Spray Booth for painting metal parts and a Precision Quincy Corporation electric oven for baking the painted parts. (Rules 62-296.500(3)(a) and 62-4.040, F.A.C.)

Generic and Temporary Exemptions – Rule 62-210.300(3)(b), F.A.C.

- Approximately 60 assorted small boilers, hot water heaters, and dehumidifiers with a collective heat input rating of approximately 40 MMBtu/hr. (see enclosure 5 of the permit application submitted to the Department on 9/25/2007, for the list of equipment at the time of application). Each unit is individually considered exempt from permitting.(Rule 62-210.300(3)(b)1, F.A.C.)
- Pre-saturated IPA cleaning wipes (Rule 62-210.300(3)(b)1, F.A.C.)
- Sampling booth G0716 (IPA) (Rule 62-210.300(3)(b)1, F.A.C.)
- Hand sanitizer dispensers (Rule 62-210.300(3)(b)1, F.A.C.)

Categorical and Conditional Exemptions – Rule 62-210.300(3)(a), F.A.C.

- Quality Control Laboratory (Rule 62-210.300(3)(a)12, F.A.C.)
- Miscellaneous machine shop operations (Rule 62-210.300(3)(a) 8, 13, 16, and 24, F.A.C)
- Fire and safety equipment (Rule 62-210.300(3)(a)15, F.A.C.)
- Application of fungicide, herbicide, or pesticide (Rule 62-210.300(3)(a)17, F.A.C.)
- Restaurants (Rule 62-210.300(3)(a)20, F.A.C.)

Exemptions under Rule 62-4.040(1)(b), F.A.C., may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

{Note: Per rule 62-210.300(3), an emissions unit or pollutant-emitting activity exempt from the requirement to obtain an air construction permit shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if it is contained within a Title V source or if its emissions, in combination with the emissions of other emission units and activities at the facility, would cause the facility to be classified as a Title V source.}

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants VOC, Individual HAP and total HAPs. The emission limitations in this permit will ensure that the facility's VOC, Individual HAP and total HAPs emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Modifies Permit No. 1030112-029-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division (PCAQD). The PCAQD mailing address and phone number is:

   Pinellas County Air Quality Division
   300 South Garden Avenue
   Clearwater, Florida 33760
   Telephone: 727-464-4422

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements;
   e. Appendix E. Emission Unit No. 001-Equipment Vented to the RTO;
   g. Appendix F. RTO Operation and Maintenance Plan.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes modification of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. copies of the most recent month of records/logs specified in Specific Condition No(s). B.17. and B.18.; and

   c. any proposed revisions to the most recently approved O & M Plan, if applicable.

   The application shall be submitted to the Permitting Authority and the Compliance Authority.

   [Rules 62-4.030, 62-4.050 and 62-4.220, F.A.C.]

9. Unconfined Particulate Matter Emissions: In order to control unconfined particulate matter emissions from the facility, the permittee shall: (i) Water any dusty outdoor areas to minimize dust entrainment and (ii) Sweep, as needed, all outdoor paved areas.
[Rule 62-296.320(4)(c), F.A.C.; Construction Permit 1030112-029-AC]

10. Volatile Organic Compounds (VOC)/Organic Solvents (OS): No person shall store, pump, handle, process, load, unload, or use in any process or installation any VOC/OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

    a. Maintain covers, lids, etc., on all containers of VOC/OS when they are not being handled, tapped, etc.

b. Prevent excessive air turbulence across exposed VOC/OS.

c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC/OS so that it can be covered when not in use.

d. All fittings, valve lines, etc., shall be properly maintained.

e. All VOC/OS spills shall be attended to in a timely manner and the waste properly disposed of, recycled, etc.

[Rules 62-4.070(3) and 62-296.320(1), F.A.C.]

11. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C. and Pinellas County Code, Section 58-178]

12. Equipment Labeling: Each piece of equipment indicated and/or identified in this permit shall be properly labeled. Such labels shall be legible and accessible for inspection by the Department and/or PCAQD.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030112-029-AC]

13. Stack Sampling: The permittee shall install and maintain stack sampling facilities (as required), including ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet the requirements of Rule 62-297, F.A.C. and any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.
[Rule 62-297.310(6), F.A.C.]

A. Common Conditions

This section of the permit addresses all the regulated emissions units at this facility.

A.1. Emission Limitations: Total combined emissions from the regulated emission units (E.U. 001, 003, 005, 006 and 007) shall not exceed the following for any consecutive 12-month period:

Pollutant	(Tons/ Any consecutive 12 month period)
VOC	95.0
Any Individual HAP	9.5
Total HAPs	23.7

[Rules 62-210.200 (Potential to Emit), 62-210.300(2)(b), F.A.C.; Construction Permit 1030112-029-AC]

A.2. VOC & HAP Monthly Records: To demonstrate compliance with the emission limitations of Specific Condition No. A.1., the permittee shall maintain the following records:

a. Facility name, Facility ID No. (1030112) and month/year.

b. The total VOC emissions from the regulated emission units for the month, in tons.

c. The individual HAP emissions (for Xylene, Ethylbenzene, and Methanol) from the regulated emission units for the month, in tons.

d. The total HAP emissions from the regulated emission units for the month, in tons.

e. The total VOC emission from the regulated emission units for the most recent consecutive 12-month period, in tons.

f. The individual HAP emissions (for Xylene, Ethylbenzene, and Methanol) from the regulated emission units for the most recent consecutive 12-month period, in tons.

g. The total HAP emissions from the regulated emission units for the most recent consecutive 12-month period, in tons.

[Rule 62-4.070(3), F.A.C.]

A.3. Records Retention: The permittee shall comply with the Records Retention conditions of Appendix C. Additionally, all daily records required by this permit shall be completed within five (5) business days and all monthly records shall be completed by the end of the following month. All records required by this permit shall be maintained at the facility for at least three years, unless otherwise noted, and be made available to the Department and/or the Pinellas County Air Quality Division (PCAQD) for inspection upon request. Note: A business day is defined as Monday through Friday, excluding holidays and facility shutdowns.
[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

B. EU No. 001 – Pharmaceutical Manufacturing Equipment Vented to RTO

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Pharmaceutical Manufacturing Equipment Vented to RTO: This emissions unit consists of several pieces of process equipment including step and spray washers and packing line equipment. This equipment is summarized in Appendix E (Emission Unit No. 001-Equipment Vented to the RTO). In addition to the equipment listed in Appendix E, this emissions unit also includes the Ethanol Cabinet Supply Pumps. VOC emissions from solvents such as, but not limited to Ethanol and Naphtha, result from the following: (a) The softgel encapsulation, cleaning and drying processes (softgels, which are initially coated with oil during the encapsulation process, are conveyed through an Ethanol or Naphtha cleaning process and then dried), (b) The counting and packaging process, and (c) The Naphtha Groundwater Remediation System (NGRS). The majority of VOC emissions (see Appendix E) are controlled by an Advantage Energy Group Premier™ 12 Regenerative Thermal Oxidizer (RTO) which has a maximum inlet airflow rate of 13,500 ACFM and a minimum VOC destruction efficiency of 95.0%. The RTO is fired with natural gas at a maximum heat input rate of 2.66 MMBTU/Hour during normal operations. This heat input rate can reach up to 3.5 MMBTU/Hour when the RTO is loaded with natural gas during start-up and may last up to 2 hours. The naphtha and ethanol maximum theoretical loading rates corresponding to the maximum heat input rate during normal operations (2.66 MMBTU/Hour) are as follows: (a) 100% Naphtha maximum inlet loading = 157 pounds/hour. (b) 100% Ethanol maximum inlet loading = 223 pounds/hour. (c) Ethanol & Naphtha mixture maximum inlet load = 157(Mass fraction of naphtha) + 223(Mass fraction of ethanol) For example, if the inlet stream is 60% ethanol and 40% naphtha, the maximum inlet loading rate to the RTO is 196.6 pounds per hour. Uncaptured/fugitive emissions from quality assurance/quality control activities are vented outside the facility via the general building ventilation. *Notes:* *(a) This facility also includes packing lines (e.g., East Wing Packing Line 1) which do not use VOC containing solvents. These packing lines are dry processes (i.e., solvent free) and are not considered emission sources.* *(b) The NGRS is the result of the implementation of a Remedial Action Plan (RAP) initially proposed by the facility in a letter dated February 7, 2001 and subsequently changed in accordance with materials submitted on October 11, 2001.*

PERFORMANCE RESTRICTIONS

B.1. Restricted Operation: The hours of operation of are not limited (8760 hours per year).

B.2. RTO Operation Restrictions: The RTO is limited as follows:

Maximum Heat Input Rate (MMBTU/Hour)		Minimum Operating Temperature (°F)
2.66	(Normal Solvent Loading)	1,450
3.5	(Initial startup with natural gas)	

*Refer to Appendix E titled "Emission Unit ID No. 001 – Equipment Vented to the RTO" for the list of equipment/machines venting to the RTO.

{Note: The heat input can reach 3.5 MMBTU/Hour when the RTO is loaded with natural gas during initial start-ups (can last up to 2 hours). Normal solvent loading heat input is 2.66 MMBTU/hour.}

[Rules 62-4.070(3), 62-210.200, Definitions – (PTE), F.A.C.; Construction Permit 1030112-029-AC and Permit Application dated 06/05/2012]

B.3. RTO Controlled Equipment List: The RTO shall only control emissions from equipment listed in Appendix E (Emission Unit No. 001 – Equipment Vented to the RTO).
[Rule 62-4.070(3), F.A.C., Permit Application dated 06/05/2012]

B.4. Destruction Reduction Efficiency (DRE): The RTO shall be properly maintained and operated in order to ensure that the RTO will have a minimum of 95.0% removal of the VOC vapors as determined from the inlet to the outlet. Additionally, the permittee shall demonstrate that process equipment connected to the RTO meet the requirement given in Method 204 for enclosures (i.e., Permanent Total Enclosures or Temporary Total Enclosures) during any required control device efficiency test.

{Permitting note: the above enclosure requirements for process equipment connected to the RTO were based on Rule 62-297.450(4)(e) & (f)}

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030112-029-AC and Permit Application dated 06/05/2012]

B.5. Capture Efficiency (CE): The capture efficiency of each piece of process equipment venting to the RTO shall be determined by one of the following methods:

A. A CE factor of 100% shall be utilized for each piece of process equipment demonstrating Permanent Total Enclosure (PTE) and directing all VOC emission to the RTO. PTE shall be demonstrated by meeting the requirements of Method 204, adopted and incorporated by reference in Rule 62-204.800, F.A.C., or by equivalent method as approved by the Department for this source.

B. If a PTE is not installed, the actual CE shall be determined.

[Rules 62-4.070(3), 62-204.800 and 62-297.450, F.A.C.]

TESTING REQUIREMENTS

B.6. DRE Testing Frequency: The RTO shall be tested to demonstrate compliance with minimum Destruction Reduction Efficiency (DRE) for VOC specified in Specific Condition B.4.:

a. DRE Testing for Permit Renewal: Between 365 days and 105 days prior to the expiration date of this permit, the RTO shall be tested.

b. DRE Testing to Increase Limited Operation Rates: If the RTO is tested at a heat input rate that is lower than the 90% permitted maximum heat input rate specified in Specific Condition No. B.2., then operation of the RTO is limited to 110 percent of the test heat input rate until a new test is conducted. New tests may be conducted as needed to gain authority to operate at higher heat input rates up to the permitted maximum heat input rate. (See Section 4, Appendix D, 1. Operating Rate During Testing).

[Rule~~s~~ 62-297.310(7)~~,~~ F.A.C. and Permit Application dated 06/05/2012]

{Note: See Specific Condition No. B.20., "Equipment Replacement: for special cases where equipment replacement is allowed.}

B.7. DRE Test Method: The minimum VOC DRE of the RTO shall be determined using EPA Method 25 on the inlet and outlet* air ducts of the RTO. This test method is contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-204.800, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297.401, F.A.C. and 40 CFR 60, Appendix A.

**EPA Method 25A may be used if the outlet concentration is less than 50 ppmv as carbon. If Method 25A is chosen as the test method, and the outlet concentration is greater than or equal to 50 ppmv, the test must be repeated, using EPA Method 25.*

[Rules 62-297.401 and 62-204.800, F.A.C.; 40 CFR 60, Appendix A]

B.8. CE Testing: Each piece of process equipment venting to the RTO shall be tested [at 90-100% of its operating capacity] no later than ninety (90) days after initial operation of any new or replacement process unit. Test thereafter between 365 days and 105 days prior to the expiration date of the operation permit as part of the air operation permit renewal process.

{Permitting note: See Specific Condition No. B.20, "Equipment Replacement" for special cases where equipment replacement is allowed.}

[Rules 62-4.070(3), 62-297.310(7) and 62-297.310(8)(b), F.A.C.; Permit Application dated 06/05/2012]

B.9. CE Test Method: CE testing shall be conducted in accordance with Method 204, adopted and incorporated by reference in Rule 62-204.800, F.A.C.
[Rule 62-297.450, F.A.C.]

B.10. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(7)(a)9., F.A.C.]

B.11. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content.
9	Visual Determination of the Opacity of Emissions from Stationary Sources
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer
204	Criteria for and Verification of a Permanent or Temporary Total Enclosure.

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

B.12. Additional Testing Requirements: All compliance test results shall be submitted to the Permitting Authority and to the Compliance Authority within forty-five (45) days of testing. Compliance test results shall include the following:

a. A copy of the RTO's continuous temperature strip chart during the test period.

b. A copy of the "RTO Loading Records" calculated based on the test results and as required by Specific Condition No. B.18.

c. A copy of the "VOC and HAP Monthly Records" records for the month the test was conducted as required by Specific Condition No. B.17.

[Rules 62-4.070(3) and 62-297.310, F.A.C.; Construction Permit 1030112-029-AC and Permit Application dated 06/05/2012]

MONITORING REQUIREMENTS

B.13. RTO Temperature Monitoring: The permittee shall operate and maintain a monitor to measure the operating temperature of the RTO. Continuous strip chart and/or digital recording of the temperature or a previously approved Department and PCAQD equivalent monitoring/recording technology shall be available on site at all times.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030112-029-AC]

NOTIFICATION REQUIREMENTS

B.14. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test. The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.

Note, since U.S. EPA audit samples are required for an EPA Method 25 test and if EPA Method 25 will be used, the permittee of the tested facility shall obtain an audit sample, if commercially available, from an accredited audit sample providers (AASP) for each test method used for regulatory compliance purposes. If multiple sources at a single facility are tested during a compliance test event, only one audit sample is required for each method used during a compliance test. The compliance authority responsible for the compliance test may waive the requirement to include an audit sample if they believe that an audit sample is not necessary.

"Commercially available" means that two or more independent AASPs have blind audit samples available for purchase. If the source owner, operator, or representative cannot find an audit sample for a specific method, the owner, operator, or representative shall consult the EPA Web site at the following URL, www.epa.gov/ttn/emc, to confirm whether there is a source that can supply an audit sample for that method.

[Rules 62-4.070(3), 62-297.401 and 62-297.310(7)(a)9., F.A.C.]

B.15. Notification of Operation Commencement The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU No. 001 after modifications authorized by this permit are complete, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose. [Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

B.16. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

B.17. VOC and HAP Monthly Records: To demonstrate compliance with the allowable VOC and HAP emissions limitations specified in Specific Condition No. A.1., the permittee shall maintain at a minimum, the following monthly records:

a. Facility Name, Facility ID No. (1030112), Emission Unit ID No. (001), Month and Year.

b. The total hours of operation for the month and for the most recent consecutive 12-month period.

c. The VOC Destruction Efficiency of the RTO (based on the latest compliance test results).

d. The total VOC and HAP emissions (determined based on RTO destruction efficiency and the capture efficiencies of connected process equipment) for the month, in tons.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C. ; Construction Permit 1030112-029-AC]

B.18. RTO Load Records: The permittee shall create and maintain records to demonstrate compliance with the RTO Maximum Heat Input Rate for "Normal Solvent Loading" of Specific Condition No. B.2. Records shall be updated whenever configuration or parameter changes occur that result in an increase in the potential load to the RTO. At a minimum, the records shall include:

A. Facility Name, Facility ID No. (1030112), Emission Unit No. (001) and Date.

B. For each machine, list the following:

1. The equipment name and I.D. number,
2. The name of the solvent used (ethanol or naphtha),
3. The solvent feed flow rate. In the case of the two spray washers equipped with ball valves, indicate whether the solvent feed flow is on or off *,
4. The maximum operating capacity (solvent feed flow rate) to the machine.

C. VOC input rate to the RTO in pounds/hour.

D. VOC emission rate from the RTO in pounds/hour.

E. The VOC removal efficiency of the RTO.

F. Maximum RTO inlet loading in MMBTU/Hour. The maximum loading shall be calculated assuming all equipment is in operation and shall be based on the worst case scenario. For example, if a machine can be operated with either material (ethanol or naphtha), then determine which VOC material will generate the highest RTO loading. Calculations shall include sufficient information to support results.

**Solvent flow rates for the following spray washers are not required because they utilize a ball valve where the flow is either on or off and cannot be adjusted: Equipment ID. Numbers OET-SGW1005 and OET-SGW2001.*

[Rules 62-4.070(3), F.A.C.; Construction Permit 1030112-029-AC and Permit Application dated 06/05/2012]

B.19. RTO Operation and Maintenance (O & M) Plan for VOC Control: The permittee shall operate and maintain the RTO in accordance with the Operation and Maintenance (O&M) Plan included in the permit application submitted to the Department on September 25, 2007 (See Appendix F, RTO Operation and Maintenance Plan). The O&M Plan may be amended with the prior approval of the Compliance Authority. The O&M Plan documentation logs shall be maintained for a minimum of three years. The logs shall be made available, for inspection by the Department and/or the Compliance Authority, upon request. At a minimum, the O&M Plan shall include (where applicable):

A. The operating parameters of the pollution control device.

B. Timetable for the routine maintenance of the pollution control device as specified by the manufacturer.

C. Timetable for routine periodic observations of the pollution control device sufficient to ensure proper operations.

D. A list of the type and quantity of the required spare parts for the pollution control device, which are stored on the premises of the permit applicant.

E. A record log which will indicate, at a minimum:

1. When maintenance and observations were performed;
2. What maintenance and observations were performed;
3. Who performed said maintenance and observations; and
4. Acceptable parameter ranges for each operational check.

[Rule 62-4.070(3), F.A.C. and Pinellas County Code, Section 58-128(a)]

B.20. Equipment Replacement: The permittee is allowed to replace process units included in Emissions Unit ID No. 001 with new or rebuilt units, if the replacement units are determined to be a like-kind replacement. The determination shall be based on equipment design and a comparison of past actual to projected actual emissions. The permittee shall notify the Permitting Authority and the Compliance Authority at least thirty (30) days prior to the date on which a replacement is proposed.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030112-029-AC]