



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301 • 954-519-1220 • FAX 954-519-1495

Permittee: Mr. Phillip Brancazio Watson Laboratories - Florida 4955 Orange Drive Fort Lauderdale, FL 33314	Project: Air Operating Permit Revision. Permit File No.: 0112197-013-AF Facility: Watson Laboratories, Broward County
---	--

Dear Mr. Phillip Brancazio:

Enclosed is the federally enforceable state operation permit for an air pollution source issued pursuant to Section 403.087, Florida Statutes, Broward County Standard Operating Agreement and Chapter 27, which adopted Florida Administrative Code (F.A.C.) Rules 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing). The petition must conform to the requirements of Chapters 62-103 and 28-5.201, F.A.C, and must be filed (received) in the Clerk of the Department in EPD, Air Quality Division, 115 South Andrews Avenue, Room A-240, Fort Lauderdale, FL 33301, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of EPD.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in EPD, Air Quality Division, 115 South Andrews Avenue, Room A-240, Fort Lauderdale, FL 33301, 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 of Appeal must be filed within 30 days from the Final Order is filed with the Clerk of the Department.

Executed in Broward County, Florida
Broward County Environmental Protection Department

Daniela Banu, Director
Air Quality Division

cc: Darrel Graziani, PE, District Air Program Administrator, FDEP Southeast District (electronic mail)
Tiffany Holmes, EHS Manager

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

Clerk Date



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301 • 954-519-1220 • FAX 954-519-1495

Final Air Operating Permit

Permittee:

Mr. Phillip Brancazio
Responsible Official
Watson Laboratories - Florida

Permit No: 0112197-013-AF

Date of Issue: September 4, 2007

Expiration Date: March 14, 2010

Project: Permit Revision

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above-named Permittee is hereby authorized to perform the work or operate the source shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Environmental Protection Department (EPD) and made a part hereof and specifically described as follows:

Note: The permit voids and supersedes operating permit No. 0112197-012-AO issued May 3, 2006.

Source: The source consists of an existing Pharmaceutical Manufacturing Operations (SIC #2834) at 4955 Orange Drive, Fort Lauderdale, FL 33314 (the "4955" location); and at 4001 SW 47th Ave, Fort Lauderdale, FL 33314 (the "4001/4011" locations). The Latitude/Longitude are 26°4'18"N/80°12'40"W and 26°4'14"N/80°12'38"W for the "4001/4011" and the "4955" facilities, respectively.

Volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions generated during the manufacturing of pharmaceutical products are collected in exhaust systems and directed to a complex vapor collection and processing system (VCPS). The VCPS includes all equipment such as ducts, valves, exhaust system, computer hardware and software, and catalytic oxidizers that manages the VOC and HAP emissions from the time of generation until the final discharge to the atmosphere.

Project: The purpose of this project is to revise the source existing operating permit to implement an alternate "Best Operating Practices to Minimize Emissions Plan" (BOPP) for operating during a malfunction of the source pollution control system. The existing BOPP is based on a Settlement Agreement between EPD and the source, and requires that the source terminate spraying of solvents during batch processing to minimize emitting volatile organic compounds (VOC) and hazardous air pollutants (HAP) directly to the atmosphere. Spraying of solvents then continues when the pollution control system is operational.

Products manufactured from processes that have been interrupted (as required by the existing BOPP) are subject Food & Drug Administration regulations on "Reprocessing". The source requested an alternate BOPP to comply with the reprocessing regulation without incurring substantial financial losses.

Important Regulatory Classifications: The source is classified as a synthetic minor source for VOC under the federal Prevention of Significant Deterioration (PSD) regulations and the Title V program by relying on control devices (i.e. catalytic oxidizers) to limit the VOC emissions to below 100 TPY. Any future permitting action that requires increasing the VOC limit to above 100 TPY would subject the source to an after-the-fact pre-construction review in accordance with Rule 62-212.400(2) (g), F.A.C. for phased construction projects (see Attachment A). The source is also a synthetic minor source for HAPs under the Title III Hazardous Air Pollution Program.

Broward County Board of County Commissioners

Josephus Eggelletion, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keech • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin •
Lois Wexler
www.broward.org



Operate: This permit is for operating following emission units (EU):

E.U.

ID No. Brief Description

EU-005	<i>Manufacturing Operations using Catalytic Oxidizers</i> VOC and HAP emissions from fluid bed processors and coating pans are directed to dust collectors and catalytic oxidizers controls prior to discharge to the atmosphere.
EU-006	<i>Fugitive Sources of VOC and HAP Emissions</i> (storage tanks, drying ovens, cleaning, miscellaneous R & D activities, etc)
EU-007	<i>Fugitive Sources of Particulate Matter (PM/PM10) Emissions</i> (manufacturing and R & D fluid-beds, drying ovens, tablet machines/presses, central vacuum systems, and miscellaneous equipment/ work areas)

Attachment A shows the equipment addressed by this permit.

In Accordance with: Request for a permit revision received on June 28, 2007, construction permit No. 0112197-011-AC effective September 12, 2005, Notice of Intent to Issue a permit dated August 16, 2007, and published on August 21, 2007 in the Sun-Sentinel newspaper.

Subject to: Conditions 1 - 36.

GENERAL CONDITIONS

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth herein are accepted and must be completed by the Permittee and enforceable by the Environmental Protection Department (EPD) pursuant to this Code and Sections 403.141, 403.727, or 403.859 through 403.861 of the Florida Statutes (F.S.). The Permittee is placed on notice that EPD will review this permit periodically and may initiate administrative and/or judicial action for any violation of the conditions by the Permittee, its agents, employees, servants or representatives.
2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the EPD.
3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement trust Fund may express State opinion as to title.
5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source,

or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and DEP rule, unless specifically authorized by an order from the EPD.

6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by EPD and DEP rules.
7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized EPD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or EPD and DEP rules.
8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide EPD with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to educe, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by EPD for penalties or for revocation of this permit.The Permittee shall report any periods of noncompliance to the EPD immediately by phone 954-519-1499, and (if available) by Email EPDHOTLINE@broward.org or by FAX 954-519-1493. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.
[Rules 62-4.160 (8), F.A.C.]
9. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the EPD, may be used by the EPD as evidence in any enforcement proceeding arising under the Florida Statutes or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or DEP rules.
11. Permit Transfer. This permit is transferable only upon EPD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the EPD.
12. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:
- (a) Upon request, the Permittee shall furnish all records and plans required under DEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the EPD.
 - (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by EPD rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed.
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used;
 - 6. The results of such analyses.
14. Information Submittal. When requested by the EPD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the EPD, such facts or information shall be corrected promptly.
15. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.

SPECIFIC CONDITIONS

{ **VCPS Definition:** The vapor collection and processing system (VCPS) includes all equipment such as ducts, valves, exhaust system, computer hardware and software, and catalytic oxidizers that manages the VOC and HAP emissions from the time of generation until the final discharge to the atmosphere. }

16. Synthetic Minor Source of VOC and HAP Emissions. In order to maintain a synthetic minor classification under the PSD, Title V, and Title III permitting program, the owner or operator shall ensure that in any consecutive fifty-two (52) week period, the emissions from all sources within the combined facilities (i.e. 4001/4011 & 4955) remain below the following threshold: 100 tons of VOC, 10 tons of any individual HAP, and 25 tons of total HAPs.
[Rules 62-210.200(159) (a), (b) & 62-212.400(2) (d) 2.b, F.A.C.]
(Permitting Note. Any future modification that requires increasing the VOC limit to a level greater than 100 TPY would subject the facility to an after-the-fact pre-construction review under the PSD permitting program in accordance with Rule 62-212.400(2)(g), F.A.C. (see Attachment A on phased projects))
17. Objectionable Odor. 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.]

18. General Pollution Emission Limiting Standards, VOC or Organic Solvents (OS) Emissions. The owner or operator shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPD. The following requirements are deemed necessary by EPD: Use of a VCPS (see definition above) to control VOC is deemed necessary by EPD.

[Rule 62-296.320(1) (a), F.A.C.]

19. General Particulate Emission Limiting Standards. General Visible Emissions Standard.

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 that designated as Number 1 on the Ringelmann Chart (20 percent opacity).

[Rules 62-296.320(4) (b) 1. & 4, F.A.C.]

20. Unconfined Emissions of Particulate Matter. A source of fugitive particulate matter shall take reasonable precautions to control emissions of fugitive particulate matter. Reasonable precautions shall include but not be limited to the use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter (PM)

[Rule 62-296.320(4)(c) F.A.C.; Broward County Code, Sec. 27-175(h) & Sec. 27-177(b)]

21. Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.

[Broward County Code, Sec. 27-175(b)]

22. Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

[Broward County Code, Sec. 27-175(c)]

23. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.

In addition, the owner or operator shall implement the following Preventive Maintenance Inspection Program (PMIP) by:

- (1) Conducting and documenting ongoing training for current and new employees on the verification of the operability of each VCPS;
- (2) Inspecting each VCPS at least once a month and document results at least 5 days after each inspection;
- (3) Obtaining a certified verification check from the manufacturer on operability for all VCPS at least once a year and after each modification or repair of a VCPS;
- (4) Conducting VOC destruction efficiency testing on each catalytic oxidizer (see “*Testing*”, below)

[Broward County Code, Sec. 27-175(d); Settlement Agreement Case No. 03-0041]

(Permitting Note: EPD considers an oxidizer efficiency in excess of 95 percent (used for calculations in the permit application) with no leaks in the vapor collection system to be an indicator of acceptable maintenance of the VCPS. Operating at efficiencies below 95 percent could be considered (on a case-by-case basis) to be a violation of the PMIP.)

24. Emissions Computation and Reporting.

- (1) **Annual Operating Report (AOR).** The AOR (DEP Form No. 62-210.900(5)) for the facility shall be completed each year and submitted to the EPD by March 1 of the following year.
- (2) **Emissions Computing Approaches for the AOR.** The owner or operator shall employ, on a pollutant-specific basis, the most accurate methodology to compute the emissions of a pollutant from an emissions unit. The following are available methodologies from most to least order of accuracy: Continuous emissions monitoring (CEMS), mass balance approach, site-specific emissions factor, and published emissions factor
- (3) **Fugitive Emissions.** The owner or operator shall account for fugitive emissions of pollutants, to the extent quantifiable, associated with the source.
- (4) **Recordkeeping.** The owner or operator shall retain a copy of all records used to compute emissions for a period of five years from the date on which such emissions information is submitted to the EPD.
[Rule 62-210.370, F.A.C.]
(Permitting Note. The owner or operator may also elect to submit the AOR electronically using the software provided by DEP. Electronic version of the AOR shall be sent directly to DEP.)

25. **Operating Permit Renewal.** Sixty days before the expiration date of this operation permit, the Permittee shall apply for a renewal of permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-090 (1), F.A.C.]
(Permitting Note: The Permittee may also elect to submit the application electronically using the FDEP EPSAP software available at <http://www.dep.state.fl.us/air/software.htm> website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]

Emission Limiting Standards

26. **Non-fugitive VOC Emissions from Sources using the VPCS (see note below).**
- (1) The efficiency of the oxidizers shall be 95 percent or higher.
 - (2) The amount of VOC solvents used in batch operations with exhaust emissions directed to the VPCS shall not exceed 1,800 tons during any rolling 52 week period.
 - (3) The collection efficiency of the VPCS shall be 100 percent (i.e. no leaks).
- [Rule 62-4.070(3), F.A.C.]
(Permitting Note. The 1,800 tons limit corresponds to 90 TPY non-fugitives emissions from the oxidizers (assuming 95 percent oxidizer efficiency). Exceedance of 90 TPY requires a permit revision to increase the frequency of record-keeping and facility-wide emissions calculations in order provide EPD with additional reasonable assurance of synthetic minor status.)
(Permitting Note. **VPCS** used in the permit conditions means Vapor Collection and Processing System, which includes all equipment including ducts, valves, exhaust system, computer hardware and software, catalytic oxidizer, etc., that manages the vapors from the source of generation to the final discharge point to the atmosphere.)

Method of Operation

27. **Modes of Operation.** The modes of operation are Non-Solvent (aqueous) and Solvent (VOC). The VPCS shall be in the "Solvent" mode for batch processing so that VOC emissions generated during solvent spraying operations are directed to the oxidizer for processing (instead of not directly to the atmosphere).

[Rule 62-4.070(3), (5), F.A.C.]

(Permitting Note. Mechanical or computer logic failure could cause the system to go into the oxidizer bypass mode (i.e. Non-Solvent mode) instead of Solvent mode during operations that generates VOC emissions.)

28. Operation during VCPS failure.

(1) *VCPS failure due to malfunction.* Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing

(a) The best operational practices plan (BOPP) to minimize emissions is adhered to and

(b) The duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the EPD for longer duration.

(2) – (3) [Reserved]

(4) *VCPS failure not due to malfunction.* 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.

[Rules 62-210.700(1), and (4)]

(Permitting Note. Malfunction means any unavoidable mechanical and/or electrical failure of the VCPS or process equipment or of a process resulting in operation in an abnormal or unusual manner. Failures caused in part by poor maintenance or careless operations are not malfunctions. The owner or operator could use historical VCPS failure reports to demonstrate that the cause of failure was abnormal or unusual.)

(Permitting Note. A copy of the current BOPP is kept on file at EPD Air Quality Division.)

Testing Requirement

29. Frequency and Methodology. During each fiscal year (October 1 - September 30), the owner or operator shall conduct emissions testing on each VCPS to determine the collection system efficiency and the VOC destruction efficiency. All repairs to the VCPS (including oxidizer functionality testing) shall be conducted prior to formal testing. Tests shall be conducted in accordance with the appropriate USEPA Method(s).

[Rule 62-4.070(3) & (5) F.A.C., Settlement Agreement - Cases No. 02-0023 and 02-0024]

(Permitting Note. EPD considers an oxidizer efficiency in excess of 95 percent with 100 percent collection efficiency (i.e. no leaks in the vapor collection system), to be an indicator of acceptable maintenance of the VCPS.)

Notification

30. Testing Notification. The owner or operator shall notify the EPD, at least 15 days prior to the date on which each VCPS test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. The owner or operator shall also provide EPD with a test protocol at least 30 days prior to testing.

[Rule 62-4.070(3) & (5) F.A.C.]

31. Notification of VCPS Failure due to Malfunction. In case of excess emissions resulting from malfunctions, the owner or operator shall immediately notify the EPD in accordance with Rule 62-4.130, F.A.C. which requires that the notification includes pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence.

Notification shall be made by phone 954-519-1499, and (if available) by Email EPDHOTLINE@broward.org or by FAX 954-519-1493.

Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rules 62-210.700(6), 62-4.130, & 62-4.070(3) F.A.C.]

(Permitting Note. Notification of VCPS Failure not due to malfunction shall be in accordance with General Condition No. 8 “*Notice of Noncompliance*” (see above).)

Recordkeeping Requirement

33. Emission Records. The owner or operator shall maintain records of: (1) weekly calculations of the VOC and HAP emissions (i.e. fugitives and non-fugitives) from each building (see Attachment A), and (2) calculations of the entire facility VOC and HAP emissions (in Tons) for the previous fifty-two (52) weeks. The owner or operator shall use the VOC destruction efficiency obtained from the most recent VCPS performance testing to calculate non-fugitive emissions from the VCPS.
[Rule 62-4.070(3), F.A.C.]

34. VCPS Records. The owner or operator shall maintain all records related to each VCPS including, but not limited to, operator training, periodic inspections, failures, maintenance and testing, in a form suitable for review by EPD for a period of 5 years. Records of verification check for operability shall be maintained for the life of the VCPS.
[Rules 62-4.070(3)]

Reporting Requirement

35. Test Report. A written report containing the results of the emissions test shall be provided to the EPD within sixty (60) days of completion of each test. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow EPD to determine if the test was properly conducted and the test results properly computed. The report shall also contain results of supplementary system tests (e.g. the oxidizer’s functionality reports to verify the operation modes (see “Modes of Operation” above)).
[Rule 62-4.070(3), F.A.C.; Settlement Agreement - Cases No. 02-0023 and 02-0024]
36. VCPS Failure Report. The owner or operator shall submit an incident report on each VCPS failure within fifteen (15) days of the event. The report shall include pertinent information as to the cause of the failure, steps taken to correct the problem and to prevent a reoccurrence, and an estimate of the excess VOC emissions due to the VCPS failure along with the total facility wide VOC emissions for the previous 52 weeks.
[Rule 62-4.070(3), F.A.C.]

Attachment A
List of Equipment

I. Facility 4001 - 4001 SW 47th Avenue in Fort Lauderdale, FL

Item No.	Source	Make/Description	ID No.
1	Fluid Bed Processor	Glatt	P-001/1
2	Fluid Bed Processor	Glatt	P-036
3	Fluid Bed Processor	Glatt	P-058
4	R & D Fluid Bed Processors (2)	Glatt (2) small units	
5	Coating Pan	O'Hara Lab Coater	P-172
6	Coating Pan	Accela Cota	P-022/1
7	Coating Pan	O'Hara	F-172
8	Oven #1	Gehnrich	P-004/1
9	Oven #2	Gehnrich	P-004/2
10	Oven #3	Gehnrich	P-004/3
11	Oven #4	Gehnrich	P-004/4
12	Oven #5	Gehnrich	P-004/5
13	Oven #6	Gehnrich	P-004/6
14	R& D Small Oven	GS Blue Electric	
15	Permanent Alcohol Storage Tank	Located outside. Capacity 8,000 gallons IPA	M-541
16	Central Vacuum System		M-007/1
17	Encapsulator	Futura	P-003/2
18	Encapsulator	Bosch	P-068
19	Encapsulator	Futura	P-003/1
20	Mill	Fitzmill	P-237
21	Blender (permanent)	PK	P-055
22	Check Weigher	Bosch	P-023/1
23	Check Weigher	Bosch	P-057
24	Tablet Press	Kilian	P-226
25	R & D Miscellaneous Equipments		
26	R&D electrically power boiler		
27	Process boiler	Low sulfur (less than 1%) propane fueled 2.0 million Btu/hr process boiler	
28	Process boiler	A low sulfur (less than 1%) propane fueled 5.0 million Btu/hr process boiler	
Item No.	Source	Make/Description	ID No.

29	Catalytic Oxidizer #1	CSM Environmental Systems	P-044
30	Catalytic Oxidizer #2	MetPro	M-068
31	Chemistry Laboratory	North	
32	Chemistry Laboratory	South	
33	Generator	Diesel fuel	

II. Facility 4011- 4011 SW 47th Avenue in Fort Lauderdale, FL

Item No.	Source	Make/Description	ID No.
1	Fluid Bed Processor	Glatt #4	P-113
2	Tablet Press	Kikusui/Gemini Rotary Press	P-221
3	Tablet Press	Kikusui	P-053
4	Coating Pan		
5	R&D Operations	Misc small equipment	
6	Central Vacuum System		
7	Chemistry Laboratory		
8	Blender (Permanent)	Powder only. Non-solvent	
9	Generator	Diesel fuel	

III. Facility 4955 - 4955 Orange Drive in Fort Lauderdale

Item No.	Source	Make/Description	ID No.
1	Fluid Bed Processor #5	Glatt #5	P-105
2	Fluid Bed Processor #6	Glatt #6	P-106
3	Fluid Bed Processor #7	Glatt #7	P-108
4	Fluid Bed Processor #8	Glatt #8	P-107
5	Fluid Bed Processor #9	Glatt #9	P-385
6	Fluid Bed Processor #10	Glatt #10	P-386
7	Fluid Bed Processor #11	Glatt #11	P-387
8	Fluid Bed Processor #12	Glatt #12	P-667
9	Fluid Bed Processor #13	Glatt #13	P-668
10	Coating Pan (Accela-cota)	Thomas Engineering	P-389
11	Coating Pan (Accela-cota)	Thomas Engineering	P-390
12	Coating Pan (Accela-cota)	Thomas Engineering	P-391
13	Coating Pan (Accela-cota)	Thomas Engineering	P-592
14	Coating Pan (Accela-cota)	Thomas Engineering	P-672
15	Coating Pan (Accela-cota)	Thomas Engineering	P-673
16	Coating Pan (Accela-cota)	Thomas Engineering	P-981
17	Coating Pan (Accela-cota)	Thomas Engineering	P-982

Item No.	Source	Make/Description	ID No.
18	Coating Pan (Accela-cota)	Thomas Engineering	P-983
19	Coating Pan (Accela-cota)	Thomas Engineering	P-984
20	Coating Pan (Accela-cota)	Thomas Engineering	P-985
21	Coating Pan (Accela-cota)	Thomas Engineering	P-993
22	Coating Pan	Thomas Engineering	P-388
23	Coating Pan (Accela-cota)	Thomas Engineering	P-890
	Coating Pan	Ohara	P-1320
24	Drying Oven No. 1	O'hara	P-1117
25	Drying Oven No. 2	O'hara	P-1118
26	Drying Oven No. 3	O'hara	P-1119
27	Drying Oven No. 4	O'hara	P-204
28	Drying Oven No. 5	O'hara,	P-205
	Drying Oven No. 6	Ohara	P-202
	Drying Oven No. 7	Ohara	P-203
	Drying Oven No. 8	Ohara	P-1321
	Drying Oven No. 9	Ohara	P-1322
	Drying Oven No. 10	Ohara	P-1323
29	R & D Small Oven No. 1	Gehnrich	F-207
30	R & D Small Oven No. 2	Gehnrich	F-208
31	R&D Small oven No. 3	Gehnrich	F-219
32	R&D Small oven No. 4	Gehnrich	F-220
33	Coating Pan (O'hara)	O'hara Lab Coat III	F-191
34	Dust Collectors	3 area, 25 process (Pan coaters, Glatts)	
35	R & D Fluidized Bed Processor No. 1	Glatt	F-164
36	R & D Fluidized Bed Processor No. 2	Glatt	F-165
	Fluid Bed Processor #14	Glatt 30	P-1232
37	Chemistry Laboratory (2)		
38			
39	Permanent Blender	Gemco	P-338
40	Permanent Blender	Gemco	P-156
41	Central Vacuum System (2)	Spencer Vac. 1 in PTC, 1 in Mfg.	
42	Self-Contained Granulator	Collette Gral 300	P-607
43	Self-Contained Granulator	Collette Gral 600	P-1114
44	Catalytic Oxidizer No. 3	Met Pro	M-149
45	Catalytic Oxidizer No. 4	Met Pro	M-461
46	Catalytic Oxidizer No. 5	Met Pro	(under

			construction)
47	Permanent Blender	Gemco	P-986
48	Permanent Blender	Gemco	P-987
49	Tablet Press	Fette	WP0007
50	Tablet Press	Fette	P-1129
51	Tablet Press	Kikusui	P-222, inactive
52	Tablet Press	Fette	(Future)
53	Tablet Press	Kikusui	P-828
Item No.	Source	Make/Description	ID No.
54	Encapsulator	MG Futura	P-003/1, P-003/2
55	Encapsulator	Bosch	P-068, P-212
56	Encapsulator	MG Futura	P-963
57	Fixed Processing Tanks	(14) total 150-400 gallons	
58	Boiler-natural gas	Kewanee 250 HP	M-296
59	Boiler-natural gas	Kewanee 250 HP	M-297
60	Generators	4 total – 3 diesel fuel, 1 natural gas	

The following equipments are portable and considered insignificant sources of air pollution:

Item No.	Source	Make/Description	ID No.
1	Portable Blenders (Powder)		
2	Portable Tri-Blenders (Powder)		
3	Portable Tanks	55 gallon drums	
4	Portable Mixing Process Tanks		

Executed in Broward County, Florida
Environmental Protection Department



Daniela Banu
Air Quality Division Director