Aveva Drug Delivery Systems, Inc. (Facility ID 0112384)
Miramar, Broward County, Florida

Comments to DRAFT Public Notice for Permit No. 0112384-008-AC. See attached draft public notice document for proposed revisions.

1. Comment 1: Under "project" section, sentence 2, add the term "or equivalent" after the proposed RTO description.
2. Comment 2: Under "project" section, sentence 3, delete the "0." It looks like it was a typo.

Comments to DRAFT Permit No. 0112384-008-AC. See attached draft Permit No. 0112384-008-AC to see where the comments presented below apply in the permit.

1. Page 1, Comment 1: Revise sentence to "...Code is 325412. The UTM..."
2. Page 1, Comment 2: Insert the term "or equivalent" after the proposed RTO description.
3. Page 1, Comment 3: Request to delete sentence "Changes to the current permitted emissions limits are revised based on the new operational restrictions cited in the construction permit application…" The application requested not to change existing emission limits of 99.9 TPY VOC; 9.99 TPY Individual HAPS; and 24.99 TPY Total HAPS. See additional comments throughout the draft permit document.
4. Page 1, Comment 4: Request to delete sentence "The individual HAP limit of 10 tons/year cannot be removed…"The application did not request to remove the individual HAP limit; instead, it requested to remove any reference to an individual HAP (e.g. xylene, toluene, etc.), since material formulation may change over time.
5. Page 1, Comment 5: Request to delete sentence "The facility submitted potential emissions calculations based on operational restrictions…" Facility wants to have flexible operations to allow them to operate up to the current permitted limit (99 TPY VOC; 25 TPY total HAPS; 10 TPY individual HAPS) without limiting the number of batches. The annual number of batches is dependent on batch size. Please see suggested language below. Suggested language is similar to the second bullet item and the applicable regulations section on page 4.

   > "The standards of 40 CFR 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, shall apply to CDLs 1, 2, 3, and 4 if the amount of VOC input to the coating process exceeds 45 Megagrams (Mg) (50 tons) in a twelve-month period. If the amount of VOC input exceeds 45 Mg (50 tons) per 12-month period, the coating lines will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60, Subpart RR."
6. Page 3, Comment 6: It's our understanding that the facility would not be subject to TV applicable requirements if VOC input exceeds 45 Mg (50 tons) per 12-month period. Request to revise sentence to:

   > "Specifically, the coating lines will become subject to 40 CFR 60.442(a) and all other section of 40 CFR 60, Subpart RR."
7. Page 4, Comment 7: Insert the term "or equivalent" after the proposed RTO description.
8. Page 4, Comment 8: Request to revise permitting note, similar to revision requested in Comment 4. Suggested revision:

   > "The standards of 40 CFR 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, shall apply to CDLs 1, 2, 3, and 4 if the amount of VOC input to the coating process exceeds 45 Megagrams (Mg) (50 tons) in a twelve-month period. If the amount of VOC input exceeds 45 Mg (50 tons) per 12-month period, the coating lines will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60, Subpart RR."
9. Page 4, Comment 9: Insert the term "or equivalent" after the proposed RTO description.

10. Page 4, Comment 10: Request to revise. The proposed RTO would be an air pollution control device. Suggested language:

    "...used for research, development and production. EU 001 and EU 002 do not currently have any air pollution controls."

11. Page 4, Comment 11: Request to revise. The application requested the facility-wide emission limits do not change and to remove the individual HAPS identified from the list in the EPSAP application. Facility is OK with the existing 9.99 TPY individual HAP limit, but does not want to list each individual HAP (e.g. toluene, xylene, etc.). Suggested language:

    "The currently permitted limits for individual HAPS (9.99 tons per 12-month period), total HAPS (24.99 tons per 12-month period), and VOC (99.9 tons per 12-month period) will be retained for this proposed project.

    The standards of 40 CFR 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, shall apply to CDLs 1, 2, 3, and 4 if the amount of VOC input to the coating process exceeds 45 Megagrams (Mg) (50 tons) in a twelve-month period. If the amount of VOC input exceeds 45 Mg (50 tons) per 12-month period, the coating lines will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60, Subpart RR."

12. Page 5, Comment 12: Request to delete "or 99,119 pounds" and just state the 50 tons, which is consistent with the 40 CFR 60, Subpart RR language.
13. Page 5, Comment 13: Request to delete the sentence "The facility requested restriction in t number of batches per year of material per year to avoid NSPS applicability.
14. Pages 8-13, Comment 14: Request to revise Section 4 Heading to "Coating Dryer Line Nos. 1 – 4 (EU Nos. 001, 002, 003, and 004)"
15. Pages 8, Comment 15: Insert the term "or equivalent" after the proposed RTO description.
16. Page 8, Comment 16: Request to revise permitting note, similar to revision requested in Comments 4 and 7. Suggested revision:

    "The standards of 40 CFR 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, shall apply to CDLs 1, 2, 3, and 4 if the amount of VOC input to the coating process exceeds 45 Megagrams (Mg) (50 tons) in a twelve-month period. If the amount of VOC input exceeds 45 Mg (50 tons) per 12-month period, the coating lines will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60, Subpart RR."

17. Page 8, Comment 17: Request to revise Condition 1. Facility would like to keep existing VOC / HAP emission limits. In addition, the facility would like to remove the table in order to help prevent potential misunderstandings. The number of batches may vary depending on batch size. Also, request to remove any reference to specific individual HAP (e.g. toluene, xylene, etc.). Suggested language:

    "Individual and total HAPs emissions are limited to 9.99 and 24.99 tons per 12-month period, respectively. VOC emissions are limited to 99.9 tons per 12-month rolling period.

    Any coating line which inputs to the coating process 45 Megagrams (Mg) (50 tons) of VOC or less per 12-month period is not subject to 40 CFR 60.442(a). If the amount of VOC input exceed 45 Mg (50 tons) per 12-month period, the coating line will be subject to 40 CFR 60.442(a) and all other section of 40 CFR 60, Subpart RR."

18. Page 9, Comment 18: Request to delete RTO downtime allowance in Condition 2.

19. Page 9, Comment 19: Request to revise last sentence in Condition 2 to: "…VOC and HAP emissions from the CDL(s) affected shall be recorded as uncontrolled and shall meet the emission limits in Specific Condition 1."
20. Page 9, Comment 20: Request to delete reference of "99,119 pounds" and revise to "50 tons" to make it consistent with language in 40 CFR 60.440(b).
21. Page 9, Comment 21: May need to revise condition numbering. See comments 25, 28, 29, 30, and 31.
22. Page 10, Comment 22: Request to delete closed bracket "]"
23. Page 11, Comment 23: Should this rule reference be updated to 40 CFR 60.442(a)(1)? 40 CFR 60.422(a)(1) is in 40 CFR 60, Subpart PP (NSPS for Ammonium Sulfate Manufacture) and address a PM standard.
24. Page 12, Comment 24: What is the rule citation for "The owner operator of an emissions unit that is subject to any limiting standard should conduct a compliance test that demonstrates compliance with the applicable emission limiting standard, outlined in Specific Condition No. 1, prior to obtaining a renewed operation permit, in order to avoid major source (Title V) applicable requirements." If it is Rule 62-297-310(7)(a)3, F.A.C., that rule is not in the most current rule language available (2015). If it is no longer applicable, request to delete this sentence.
25. Page 12, Comment 25: Should this paragraph (starting with "The owner or operator…") be its own condition? If so, the rule citation should include: [Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7)(b)46, which adopts by reference 40 CFR 60.XXX - please verify 40 CFR 60, Subpart RR rule citation.]
26. Page 12, Comment 26: Should this rule reference be updated to 40 CFR 60.443(a)(2)? 40 CFR 60.433(a)(2) is in 40 CFR 60, Subpart QQ (NSPS for the Graphics Arts Industry: Publication Rotogravure Printing) and addresses Subpart QQ's performance test and compliance provisions.
27. Page 12, Comment 27: Does this rule reference need to be revised / updated? This citation is not in the most current rule edition (2015).
28. Page 12, Comment 28: Request to pull this out of this section and put near end of permit, since condition 4 indicates this condition would only apply if VOC input was greater than 45 Mg (50 tons) per 12-month period. It appears that this requirement would apply if affected facility had a VOC input of 45 Mg (50 tons) per 12-month period.
    a. Also, request to revise so that "...(99,119 pounds)..." is replaced with '...(50 tons)..." in order to be consistent with language in 40 CFR 60.440(b).
29. Page 12, Comment 29: Request to pull this out of this section and put near end of permit, since condition 4 indicates this condition would only apply if VOC input was greater than 45 Mg (50 tons) per 12-month period. It appears that this requirement would apply regardless of whether or not the affected facility had a VOC input of 45 Mg (50 tons) per 12-month period.
    a. Request to revise: "The owner or operator shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's CHAMBER gases..."
30. Page 12, Condition 30: Request to pull this out of this section and put near end of permit, since condition 4 indicates this condition would only apply if VOC input was greater than 45 Mg (50 tons) per 12-month period. It appears that this requirement would apply regardless of whether or not the affected facility had a VOC input of 45 Mg (50 tons) per 12-month period.
31. Page 12, Comment 31: Should this be a new condition? It appears that this requirement would apply regardless of whether or not the affected facility had a VOC input of 45 Mg (50 tons) per 12-month period.

32. Page 13, Comment 32: Request to revise to “EEPD”
33. Page 13, Comment 33: Request to delete, since it’s repetitive. See comment 32.
34. Page 13, Comment 34: Request to insert "...on a daily, weekly, and monthly basis, as they apply..."
35. Page 13, Comment 35: Request to revise to clarify that downtime records are required only when coating line is running. Suggested language:

    "Daily records of RTOs downtime when coating line is running (e.g. maintenance) and note reason for taking RTO's out of service.”

Comments to DRAFT Permit No. 0112384-008-AC Appendices. See attached draft Permit No. 0112384-008-AC Appendices to see where the comments presented below apply in the permit.

1. Comment 1: Update Appendix B page numbers.
2. Comment 2: Update Appendix C page numbers.
3. Comment 3: Update Appendix Title from "E" to "D" based on Appendix Assignments on PDF page 1 of this document.
4. Comment 4: Update Appendix D/E page numbers.
5. Comment 5: Update Appendix E page numbers.
6. Comment 6: Update Appendix F page numbers.
7. Comment 7: Update Appendix G page numbers.