Environmental Protection and Growth Management Department
ENVIRONMENTAL ENGINEERING AND PERMITTING DIVISION
1 North University Drive, Mailbox 201, Plantation, Florida 33324
954-519-1483 • FAX 954-519-1495

Air Permit No. 0112384-008-AC
Permit Expires: December 28, 2018
Air Construction Permit

PERMITTEE

Aveva Drug Delivery Systems, Inc.
3250 Commerce Parkway
Miramar, Florida 33025
Authorized Representative: Scott Schneider, Sr. Manager, EHS

PROJECT

Aveva Drug Delivery Systems, Inc. is a pharmaceutical manufacturing facility that manufactures transdermal patches and sublingual films. It is located at 3250 Commerce Parkway, Miramar, Broward County, Florida. It is categorized under Standard Industrial Classification (SIC) No. 2834 and North American Industry Classification Standard (NAICS) Code is 325412. The UTM coordinates are Zone 17, 570.83 km East and 2877.3 km North. **Lat/Long:** 25°48'42" N / 80°17' 07''.

This is the final air construction permit to add an Ecopure US04-66272.11, 3.6 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO) or equivalent, to control volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions, primarily at two coater drying lines (CDLs), (EU 001 and EU 002). These emission units used for research, development and production, currently do not have air pollution controls. The new RTO will also be able to control air emissions from the two CDLs (EU 003, EU 004), used for production only, if the existing 2.5 MMBtu/hr natural gas-fired RTO is down for maintenance. Both new and existing RTOs have a 95 percent VOC destruction efficiency prior to discharge into the ambient air. The applicant did not request changes to the existing emission limits of 99 tons/year for volatile organic compounds (VOC), 9 tons/year for any individual hazardous air pollutant (HAP); and 24 tons/year for total HAP.

This construction permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility-Wide Conditions), Section 4 (Emissions Unit Specific Conditions); and Section 5 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 5 of this permit.

STATEMENT OF BASIS

This air pollution construction 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., but 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 Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954-357-7600, Fax: 954-357-7641 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 EEPD.

Executed in Plantation, Florida

Robert Wong

Digitally signed by Robert Wong
DN: cn=Robert Wong, o=Broward County Florida, ou=Environmental Engineering and Permitting Division, email=rwong@broward.org, c=US
Date: 2017.12.27 16:23:09 -05'00'

Robert C. Wong
Environmental Program Supervisor

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package 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 the date indicated below to the following persons.

Mr. Scott Schneider, Aveva Drug Delivery Systems, Inc., scott.schneider@avevadds.com
Ms. Veronica Sgro, P.E., Koogler and Associates, Inc., vsgro@kooglerassociates.com
Mr. Pradeep Raval, Koogler and Associates, Inc., praval@kooglerassociates.com
Ms. Diane Pupa, Permitting Program Administrator, Florida Department of Environmental Protection /Southeast District, diane.pupa@dep.state.fl.us.

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.

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Date: 2017.12.28 09:31:12 -05'00'

Clerk Date

FACILITY DESCRIPTION

Aveva Drug Delivery Systems is a pharmaceutical manufacturing facility that manufactures transdermal patches and sublingual films. The current operation consists of four coater drying lines (CDLs). Two CDLs (EU 001 and EU 002) are used for research, development and production and their air emissions are uncontrolled and vented directly to the atmosphere. The other two CDLs (EU 003 and EU 004) are used for production and their air emissions are controlled by a 2.5 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO), with a 95 percent VOC destruction efficiency, prior to discharge into the ambient air.

The figure below is the process flow diagram of the operation.

The existing facility consists of the following emissions units.

Facility ID No. 0112384	
ID No.	**Emission Unit Description**
001	Coater Drying Line No. 1 for Research, Development and Production.
002	Coater Drying Line No. 2 for Research, Development and Production.
003	Coater Drying Line No. 3 for Production.
004	Coater Drying Line No. 4 for Production.

Volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions will be controlled by a new Ecopure US04-66272.11, 3.6 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO) and existing 2.5 MMBtu/hr natural gas-fired RTO. Each RTO has a VOC destruction efficiency rating of 95 percent.

Permitting Note: The standards of 40 CFR 60, Subpart RR- Sensitive Tape and Label Surface Coating Operations and all the cited provisions of this subpart, shall apply to CDLs 1,2,3, and 4, if the amount of VOC input exceeds 45 megagrams (Mg) (or 50 tons) per 12 month period. Specifically, the coating lines will become subject to 40 CFR 60.442(a), all other sections of 40 CFR 60, Subpart RR.

PROPOSED PROJECT

The purpose of the project is to obtain a construction permit to add an Ecopure US04-66272.11, 3.6 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO) or equivalent to control volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions, primarily at two coater drying lines (CDLs), (EU 001 and EU 002) used for research, development and production. EU 001 and EU 002 do not currently have any air pollution control device. The new RTO will also be able to control air emissions from CDLs EU 003 and EU004, used for production only, if the existing 2.5 MMBtu/hr natural gas-fired RTO is down for maintenance. Both new and existing RTOs have a 95 percent VOC destruction efficiency prior to discharge into the ambient air.

The currently permitted emission limits of any individual HAP and total HAPs of 9 tons in any 12 month period and 24 tons in any 12 month period, respectively, and 99 tons in any 12 month period will be retained for this project.

The standards of 40 CFR 60, Subpart RR- Sensitive Tape and Label Surface Coating Operations and all the cited provisions of this subpart, shall apply to CDLs 1,2,3, and 4, if the amount of VOC input exceeds 45 megagrams (Mg) (or 50 tons) per 12 month period. Specifically, the coating lines will become subject to 40 CFR 60.442(a), all other sections of 40 CFR 60, Subpart RR.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a not 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. for the
- Prevention of Significant Deterioration (PSD) of Air Quality.
- The standards in 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 Mega grams (Mg) (50 tons) in a twelve-month period. If the amount of VOC input exceeds 45 megagrams (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.

The table below summarizes the applicable federal, state and county air pollution regulations.

SUMMARY OF APPLICABLE REGULATIONS

Summary of Applicable Federal Regulations	Summary of Applicable State of Florida Regulations
40 CFR 60, Subpart RR -Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. If the amount of VOC input exceeds 45 megagrams (Mg) or (50 tons/year) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of this subpart.	Rule 62-296.320(2) F.A.C. - Objectionable Odor
	Rule 62-296.320(4) (b) F.A.C. - General Visible Emissions Standards -20% opacity facility-wide Rule 62-296.320(4)(c) Unconfined Particulate Matter and 62-4.070(3) F.A.C. Rule 62-296.320(1) (a) F.A.C. - VOC or Organic Solvent Emissions
	Rule 62-210-650 F.A.C. Circumvention of air pollution control equipment
Summary of Applicable County Regulations	
Broward County Chapter 27 Air Pollution Control, Article IV, Sec. 27-175(b) & (d)	These regulations refer to: Concealment of emissions (b) and Maintenance (d) Note: Not Federally Enforceable

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Broward County Environmental Engineering and Permitting Division (EEPD). The EEPD mailing address is 1 North University Drive, Mailbox 201, Plantation, Florida 33324, the email address is airlicense@broward.org and EEPD's main telephone number is 954-519-1483.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the EEPD at: 1 North University Drive, Suite 201, Plantation, Florida 33324, or via the email address aircompliance@broward.org.

3. Appendices: The following Appendices are attached as part of this permit: Appendix A. Citation Formats and Glossary of Common Terms, Appendix B. General Conditions, Appendix C. General Compliance testing Requirements, Appendix D. 40 CFR 60.7 NSPS Notification and Recordkeeping Requirements, Appendix E. Symbols, Appendix F. Definitions, Appendix G. 40 CFR 60.8 NSPS Performance Testing Requirements.

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 regulations.

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

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the EEPD. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]

7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to EEPD in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Annual Operating Report (AOR). The AOR shall be submitted to the EEPD by April 1 of the following year. If the report is submitted using FDEP's electronic annual operating report software (EAOR), there is no requirement to submit a copy to EPPD. [Rule 62-210.370(3) (c), F.A.C.]

   {Permitting Note. Information on the EAOR submittal is available at http://www.dep.state.fl.us/air/emission/eaor/default.htm}

9. Operating Permit. Sixty days before the expiration date of this construction permit, the permittee shall apply for an operation permit using the forms incorporated by reference in the specific rule chapter for this type of permit. [Rule 62-4.090 F.A.C.]

   {Permitting Note: The permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing system (EPSAP) via the http://www.dep.state.fl.us/air/emission/epsap/default.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.]

1. **Not Federally Enforceable.** 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. and Broward County Code, Sec. 27-175(e)]

2. VOC or Organic Solvents 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 without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPPD. Displaced vapors generated during the loading of gasoline and denatured ethanol products shall be vented to a vapor control system.
[Rule 62-296.320(1), F.A.C.]

3. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the outdoor atmosphere any air pollutants from sources, the opacity of which is equal or greater than 20 percent. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4) (b), F.A.C.]

4. General Prohibition and Concealment. Any stationary installation which will reasonably be expected to be a source of pollution shall obtain an appropriate and valid permit, unless exempted by rule. Furthermore, 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 applicable provisions.
[Rule 62-3.030 FAC and Broward County Code, Sec. 27-175(b)]

5. 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.
[Rule 62-210.650 F.A.C and Broward County Code, Sec. 27-175(c)]

6. Maintenance. No person shall operate any air pollution control equipment or systems without proper maintenance to assure compliance with applicable emission limits.
[Rule 62-210.300 (2) (a) 2, F.A.C. and Broward County Code, Sec. 27-175(a)]

7. Special Compliance Tests. When EEPD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a EEPD rule 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 EEPD.
[Rule 62-297.310(7) (b), F.A.C.]

A. 001, 002, 003, 004

This section of the permit addresses the following emissions unit:

EU No.	Emission Unit Description
001	Coater Drying Line No. 1 for Research, Development and Production.
002	Coater Drying Line No. 2 for Research, Development and Production.
003	Coater Drying Line No. 3 for Production.
004	Coater Drying Line No. 4 for Production.

Volatile organic compounds (VOC) and hazardous air pollutants (VOC) emissions will be controlled by a new Ecopure US04-66272.11, 3.6 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO) or equivalent, and an existing 2.5 MMBtu/hr natural gas-fired RTO. Each RTOs has a 95 percent VOC destruction efficiency.

Permitting Note: Specific Conditions #s 5 through 19 and 21 through 23 apply if the VOC input exceeds 50 tons in any 12 month period.

EMISSIONS STANDARDS

1. In order to avoid major source (Title V) applicable standards, emissions of any individual HAP and total HAPs from the entire facility shall not exceed 9 tons in any 12 month period and 24 tons in any 12 month period) in any calendar month, respectively. Total VOCs from the entire facility shall not exceed 99 tons in any 12 month period). Any HAP that is also a VOC must also be included in the total VOC calculations.
   [FESOP application received September 17, 1997, construction permit application received June 17, 2017 and F.A.C. Rule 62-4.070(3)]

2. The RTOs shall be operated in accordance with the manufacturer's recommendation. The CDLs may continue to operate when RTOs are not operating. Compliance with the permitted VOC emissions limitations during these down periods shall be demonstrated in accordance with the recordkeeping requirements. VOC and HAP emissions from the CDL(s) affected shall be recorded as uncontrolled and shall meet the emission limits in Specific Condition 1.
   [Construction permit application received June 17, 2017, Rule 62-4.070(3), F.A.C.]

3. Prior to commencing operation, the new RTO shall be tested to determine the level of VOC emissions control by using EPA Method 25A at the inlet and outlet. The initial test shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.
   [Construction permit application received June 17, 2017, Rule 62-4.070(3), F.A.C.]

4. The standards in 40 CFR 60, Subpart RR shall apply to CDLs 1, 2, 3 and 4. Any facility (emissions unit/source) which inputs to the coating process 45 Mega grams (Mg) (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR 60, Subpart RR**.**
   NOTE: If the amount of VOC input exceeds 45 megagrams (Mg)(50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60, Subpart RR, and Specific Conditions 5 through 19 of this permit shall apply, which adopted by reference 40 CFR 60.440]

5. On and after the date on which the performance test required by 40 CFR 60.8 [Appendix D] has been completed:

(1) The permittee shall not cause the discharge into the atmosphere from an affected facility more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or,

(2) The permittee shall demonstrate for each affected facility;

(i) A 90 percent overall VOC emission reduction as calculated over a calendar month; or
(ii) The percent overall VOC emission reduction specified in 40 CFR 60.443(b) as calculated over a calendar month.

[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.442(a)]

COMPLIANCE TESTING REQUIREMENTS

6. (A) To determine compliance with 40 CFR 60.442, the owner or operator shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

(1) Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

(2) Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with 40 CFR 60.442(a)(1) .

-- or --

(B) To determine compliance with 40 CFR 60.442(a) (2), the owner or operator shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = \frac{G - 0.20}{G} \times 100$$

If R_q less than or equal to 90 percent, then the required overall VOC emission reduction is R_q. If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

[Broward County Code, Sec. 27- 173, which adopted by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopted by reference 40 CFR 60.443]

7. Where compliance with the emission limit specified in 40 CFR 60.442(a) (2) is achieved through the use of a solvent destruction device, the owner or operator shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in paragraph 40 CFR 60.443(b) of this section to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40 CFR 60.442(a) (2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with 40 CFR 60.442(a)(2).

[Broward County Code, Sec. 27- 173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.443(d)]

8. Where compliance with 40 CFR 60.442(a) (2) is achieved through the use of a solvent destruction device, the owner or operator shall continuously record the destruction device combustion temperature during coating operations for thermal incineration destruction devices. For thermal incineration destruction devices the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28°C (50°F) below the average temperature of the device during the most recent performance test complying with 40 CFR 60.442(a)(2).
[Broward County Code, Sec. 27- 173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.443(e)]

9. After the initial performance test required for all affected facilities under 40 CFR 60.8 [Appendix D], compliance with the VOC emission limitation and percentage reduction requirements under 40 CFR 60.442 is based on the average emission reduction for one calendar month. A separate compliance test (determination) is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard. If a common emission control device is used to recover or destroy solvent from more than one affected facility, the performance of that control device is assumed to be equal for each of the affected facilities. Compliance with 40 CFR 60.442(a) (2) is determined by the methods specified in 40 CFR 60.443(d) and is performed simultaneously on all affected facilities. Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified at 40 CFR 60.442(a) (2) is being attained.
[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 60.443]

10. The performance test for affected facilities controlled by a solvent destruction device shall be conducted as follows:

(1) The performance of the solvent destruction device shall be determined by averaging the results of three test runs as specified in 40 CFR 60.8(f) [Appendix D].

(2) Determine for each affected facility prior to each test run the weighted average mass of VOC per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in 40 CFR 60.443(a). In this application the quantities of W_{oi}, W_{si}, and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in 40 CFR 60.441 [Appendix E: Symbols].

(3) Calculate the resulting percent overall VOC emission reduction as specified in 40 CFR 60.443(b).

(4) Determine the percent overall VOC emission reduction of the solvent destruction device by the following equation and procedures:

$$R = \frac{\sum_{i=1}^{n} Q_{bi} C_{bi} - \sum_{i=1}^{m} Q_{aj} C_{ai}}{\sum_{i=1}^{n} Q_{bi} C_{bi} + \sum_{k=1}^{p} Q_{fk} C_{fk}} \times 100$$

(i) The owner or operator of the affected facility shall construct the overall VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in 40 CFR 60.446(b).

(ii) The owner or operator of an affected facility shall construct a temporary total enclosure around the coating line applicator and flash off area during the performance test for the purpose of capturing fugitive VOC emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the EEPD is satisfied that the enclosure is totally capturing fugitive VOC emissions, then no additional total enclosure will be required for the performance test.

(iii) For each affected facility where the value of R is greater than or equal to the value of R_q calculated in 40 CFR 60.443(b), compliance with 40 CFR 60.442(a) (2) be demonstrated.

[Broward County Code, Sec. 27- 173, which adopted by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopted by reference 40 CFR 60.444(c)]

11. The VOC content per unit of coating solids applied and compliance with 40 CFR 60.442(a)(1) shall be determined by either Reference Method 24 and the equations specified in 40 CFR 60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test results will govern. The EEPD may require an owner or operator to perform EPA Reference Method 24 test during such months as it deems appropriate. For EPA Reference Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.446(a)]

12. The EPA Reference Method 25 shall be used to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere. Reference Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled gas streams. For EPA Reference Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator (EEPD).
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.446(b)]

13. If the owner or operator can demonstrate to the Administrator's (EEPD) satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Administrator (EEPD) will approve testing of representative stacks on a case-by-case basis.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.446(c)].

14. The owner or operator shall demonstrate compliance with these standards using material balance calculations, the weighted average weight fraction of organics determined by EPA Reference Method 24 and the equation given in 40 CFR 60.443(a) (2) and the monthly VOC emission reductions calculated in accordance with the equation given in 40 CFR 60.443(b).
[F.A.C. Rule 62-4.070(3) and construction permit application received June 17, 2017]

MONITORING OF OPERATIONS, RECORDKEEPING AND REPORTING REQUIREMENTS

15. The owner or operator shall maintain a calendar month record of all coatings used and the results of the reference test method specified in 40 CFR 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.445(a)]

16. The records of the measurements required in 40 CFR 60.443 and 60.445 must be retained for at least two years following the date of the measurements.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.445(h)]

17. The performance test data and results from the performance test shall be submitted to the EEPD as specified in 40 CFR 60.8(a) of the General Provisions (40 CFR part 60, subpart A) [Appendix D]
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.447(a)]

18. Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the EEPD of exceedances of the VOC emission limits specified in 40 CFR 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the EEPD semiannually.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.447(b)]

19. The owner or operator of each affected facility shall also submit reports at the frequency specified in 40 CFR 60.8(c) [Appendix D] when the incinerator temperature drops as defined under 40 CFR 60.443(e). If no such periods occur, the owner or operator shall state this in the report.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.447(c)]

20. The facility will provide reasonable assurances that it is maintaining its synthetic non-Title V status by retaining records of total VOC, total HAPs, and individual HAP usage rates for the entire facility, as they apply. VOC and HAP content of all coatings and solvents shall be determined by using EPA Reference Method 24 or by the coating manufacturer's formulation records. Calculations of VOC and HAP emissions shall be performed utilizing the records and mass balance computations. Any HAP that is also a VOC must also be included in the total VOC calculations. These records shall detail VOC/HAP usage for each CDL on a monthly basis. Emission calculations shall be performed assuming 100 percent volatilization of VOCs and the most recent VOC emission reduction rate determined. These records and calculations shall be kept on site for the most recent two (2) year period and shall be made available to local, state, and federal air pollution agencies.
[FESOP application received September 17, 1997, Rule 62-4.070(3, F.A.C.]

21. The owner or operator of an affected facility operating at the conditions specified in 40 CFR 60.440(b) [inputting less than 45 Mg (50 tons) of VOC or less per 12 month period] shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.445(d)]

22. 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. The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 2.5° C.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.445(e)] ***Permitting Note: The oxidizer chamber may be monitored, if the unit is not subject to 40 CFR 60.442(a)***

23. The owner or operator of an affected facility controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be

required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.
[Broward County Code, Sec. 27-173, which adopts by reference F.A.C. Rule 62-204.800(7) (b) 49, which adopts by reference 40 CFR 60.445(g)].

24. The permittee shall keep a daily summary of RTOs usage (hours). Daily records of RTOs downtime when coating line is running (e.g. maintenance) and note reason for taking RTOs out of service. Continuously monitor the RTOs temperature (ºF), and any temperature excursions. Records shall be maintained for a minimum of two (2) years and upon request made available to the EEPD for review.
[Rule 62-4.070(3), F.A.C.]

25. The permittee shall keep records of any change in material formulation and upon request make available for review by EEPD staff.
[Rule 62-4.070(3), F.A.C.]