



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

PERMITTEE

Aveva Drug Delivery Systems, Inc.
3250 Commerce Parkway
Miramar, Florida 33025

Air Permit No. 0112384-009-AF
Air Operation Permit
Broward County, Florida

Authorized Representative: Scott Schneider, Sr. Manager, EHS

PROJECT

This final air operation permit authorizes Aveva Drug Delivery Systems, Inc. to operate the pharmaceutical manufacturer of transdermal patches and sublingual films. At this time, the facility applied to renew permit 0112384-07-AF. The renewal application was received on September 21, 2017. This permit includes the changes requested on the construction permit application received on June 17, 2017 and authorized on the construction permit 0112384-008-AC. The changes are: Adding a 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. The new RTO will also 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.

The Standard Industrial Classification No. is 2834 and the North American Standard Classification System No. is 325412. The facility is located in Broward County at 3250 Commerce Parkway, Miramar, Florida. The geographic coordinates are Latitude: 25° 28' 42" North and Longitude: 80° 17' 07" West. This final permit is organized into five sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility Wide Conditions); Section 4 (Emissions Unit Specific Conditions); and Section 5 (Appendices). The acronyms and abbreviations are defined in Appendix A of Section 5 of this permit.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Environmental Engineering and Permitting Division (EPPD). EPPD's physical address is: 1 North University Drive, Mailbox 201, Plantation, Florida 33324. EPPD's telephone number is 954-519-1483.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in 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). Petitions by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C. A petition that disputes the material facts on which the EPPD's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number

FINAL AIR OPERATION PERMIT

of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed act; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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 EEPD.

0112384-009-AF Effective Date: December 19, 2017

Renewal Application Due Date: October 18, 2022

Expiration Date: December 18, 2022

Executed in Plantation, Florida

Robert C. Wong
Environmental Program Supervisor
ENVIRONMENTAL ENGINEERING AND PERMITTING
DIVISION

FINAL AIR OPERATION PERMIT

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., vsagro@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.

Clerk

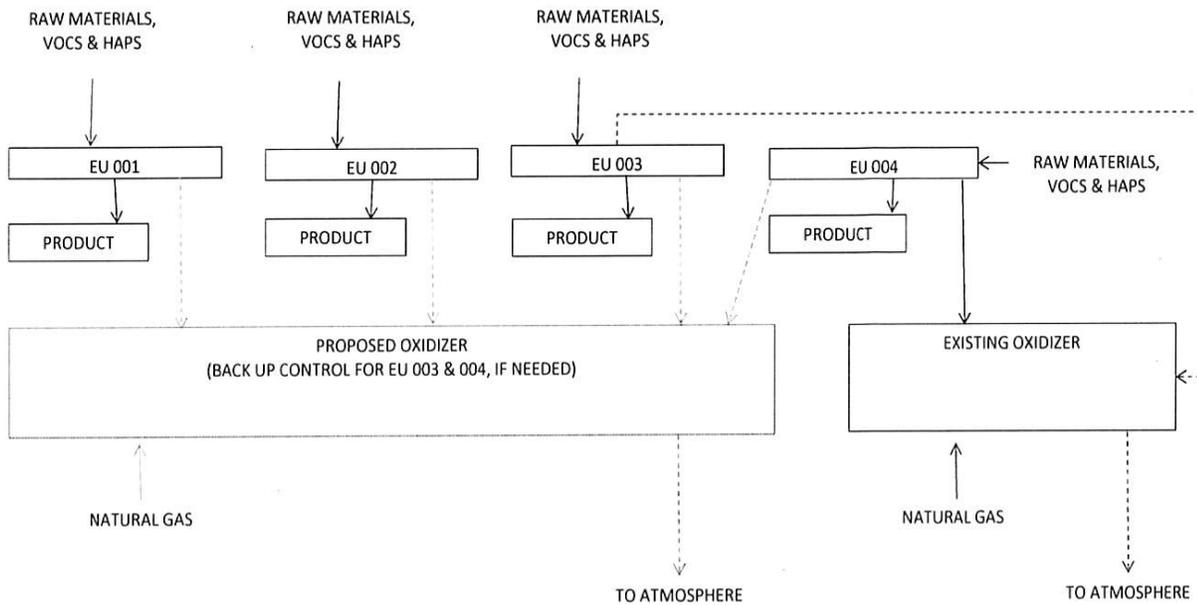
Date

SECTION 1. GENERAL INFORMATION

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.



KEY	
	Existing Process Flow
	Existing Air Flow
	Proposed Air Flow

The facility consists of the following emission unit (EU).

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.

SECTION 1. GENERAL INFORMATION

APPLICABLE REGULATIONS

The applicable regulations are summarized in the following table.

Primary Applicable Regulations	
Summary of Federal Regulations	Emission Unit
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.	001, 002, 003, 004
Summary of State of Florida Statutes and Regulations	Emission Unit
Chapter 403, Florida Statutes 62-4 F.A.C. - Permits 62-210 F.A.C. - Stationary Sources 62-296.320(2), F.A.C. - Objectionable Odor* 62-296.320(1) (a), F.A.C. - VOC or Organic Solvent Emissions 62-296.320(4) (b), F.A.C. - General Visible Emissions Standards 62-296.320(1) (a) F.A.C. - VOC or Organic Solvent Emissions 62-296.320(4) (c), F.A.C. - Unconfined Emissions of Particulate Matter 63-4.070(3), F.A. C – Reasonable Assurance	FACILITY WIDE
Summary of Broward County Regulations	Emission Unit
Chapter 27 Air Pollution Control, Article IV, Sec. 27-175(b) & (d). These regulations refer to: Concealment of emissions (b)* & Maintenance (d)*	FACILITY WIDE

*Not federally enforceable

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 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. 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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Environmental Engineering and Permitting Division (EPPD). The EPPD's physical and mailing address is 1 North University Drive, Mailbox 201, Plantation, Florida 33324 and the main telephone number is 954-519-1483. All documents related to applications for permits to operate an emissions unit shall be submitted to the EPPD.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the EPPD at: 1 North University Drive, Mailbox 201, Plantation, Florida 33324 and telephone number is 954-519-1483.
3. Appendices: The following Appendices are attached as a 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 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: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. 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. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]
8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the EPPD. All synthetic non-Title V sources or all facilities with the potential to emit 10 tons/year or more of volatile organic compounds (VOC) or 25 tons/year or more of nitrogen oxides (NOx) and located in an ozone nonattainment area or ozone air quality maintenance area shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

SECTION 3. FACILITY WIDE CONDITIONS

1. **Not Federally Enforceable 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.
[Rule 62-296.320(2) and 62-210.200 (Definitions), F.A.C.]
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 EEPD.
[Rule 62-296.320(1) (a), F.A.C.]
3. **General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-296.320(4) (b), F.A.C.]
4. **General Prohibitions**
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.]
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 62-4.030, F.A.C.] and [Broward County Code, Sec. 27-175(b) – Not Federally Enforceable]
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(d) – Not Federally Enforceable]
5. **Unconfined Emissions of Particulate Matter**
 1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
 2. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
 3. Reasonable precautions include the following:
 - a. Paving and maintenance of roads, parking areas and yards.
 - b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate

SECTION 3. FACILITY WIDE CONDITIONS

from becoming airborne.

- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.
- i. Substitution of powdery materials with granular or palletized materials, where possible.

4. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice. [Rule 62-297.320(4) (c), F.A.C., renewal application received August 17, 2017.]

6. 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 Department 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, unless the Department obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the EEPD in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rule 62-297.310(8) (c), F.A.C.]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001, 002, 003, 004

This section of the permit addresses the following emission units.

EU ID	Description of Emission Units
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 RTO has a 95 percent VOC destruction efficiency.

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

EMISSION LIMITING 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,

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001, 002, 003, 004

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.

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001, 002, 003, 004

[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:

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001, 002, 003, 004

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

(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)].

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001, 002, 003, 004

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.

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001, 002, 003, 004

[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 $\pm 2.5^{\circ}$ 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 ($^{\circ}$ F), 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.]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001, 002, 003, 004

RECORDKEEPING REQUIREMENTS

2. VOC Content: The owner or operator shall determine the VOC content of all inks, solvents, solvent-based materials, coatings, fountain solutions or any other product potentially containing volatile organic compounds, and shall monitor the usage of such materials at the referenced emission unit by recording and maintaining the following information:
 - a. The VOC content for each material containing or emitting VOC.
 - b. The material utilization rate on a monthly basis, for all materials containing or emitting VOC used at the referenced emission unit.
 - c. The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and individual product VOC content, calculated for the preceding month no later than 20 days after the end of that month.
 - d. A rolling consecutive 12-month total emission rate for VOC, calculated from the monthly totals for the previous twelve calendar months.
 - e. Maintain Material Safety Data Sheets (MSDS) for all VOC content materials utilized.
[Rule 62-4.070(3), F.A.C.]
3. Total and Individual HAP Content: The owner or operator shall determine the total and individual HAP contents of all inks, solvents, solvent-based materials, coatings, fountain solutions or any other product potentially containing hazardous air pollutants, and shall monitor the usage of such materials at the referenced emission unit by recording and maintaining the following information:
 - a. The individual and total HAP contents for each material containing or emitting HAP.
 - b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emission unit.
 - c. The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
 - d. A rolling consecutive 12-month total emission rate for individual and total HAP(s), calculated from the monthly totals for the previous twelve calendar months.
 - e. Maintain Material Safety Data Sheets (MSDS) for all materials utilized.
[Rule 62-4.070(3), F.A.C.]
4. Recordkeeping. The Permittee shall maintain records of the total VOC and HAP(s) emissions, including all inks, solvents, solvent-based materials, coatings, fountain solutions or any other product used during operation on a twelve-month rolling basis for a period of five (5) years. All records shall be made available to EEPD staff upon request.
[Rule 62-4.070(3), F.A.C.]