Division of Air Resources

Permit Review Report

Permit ID: 3-3926-00729/00054
Renewal Number: 2
Modification Number: 3 10/26/2021

Facility Identification Data
Name: PAR PHARMACEUTICAL INC
Address: 1 RAM RIDGE RD
CHESTNUT RIDGE, NY 10977

Owner/Firm
Name: STRIDES PHARMA INC
Address: 2 TOWER CTR BLVD STE 1102
EAST BRUNSWICK, NJ 08816, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: CHRISTOPHER LANG
Address: NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-5401
Phone:

Division of Air Resources:
Name: ALYSSA CARBONE
Address: NYSDEC - REGION 3
21 S Putt Corners Rd
New Paltz, NY 12561-1620
Phone:8452563058

Air Permitting Contact:
Name: TODD ARNOLD
Address: 1 RAM RIDGE RD
CHESTNUT RIDGE, NY 10977
Phone:8453644868

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

A new ACG Fluid Bed Dryer (FBD) (COAT8) & fume hood (HOOD5) for the manufacture of pharmaceutical products will be added to the existing Emission Unit T. This new equipment will produce aqueous and solvent product. The FBD will be equipped with an internal dust collector. An existing wet

scrubber (SCR03) will be used to reduce solvent emissions.

This project will also includes new pharmaceutical production and research and development (R&D) equipment, control equipment, and packaging operations that will be located in Par Pharmaceutical Inc.'s One Ram Ridge Road building.

A new Emission Unit (EU), EU 0-0000U, will consist of a new dust collection system that will be used to collect particulate matter (PM) from spot areas and/or room ventilation pick up points in five new manufacturing clean rooms (room #s 37 [MCR37], 38 [MCR38], 39 [MCR39], 40 [MCR40], and 41 [MCR41]) plus one new packaging line (PL-J). Portable equipment will be used in the manufacturing clean rooms.

The PM collected from this system will be manifolded and directed to a Torit dust collector (DC-20) then exhausted via Emission Point EP00049.

Only aqueous products will be produced in the manufacturing clean rooms and pre made pharmaceutical products will be packaged on the packaging line PL-J. Hence, only PM is emitted from Emission Unit (EU) 0-0000U. Isopropyl alcohol (IPA), a volatile organic compound (VOC), will only be used for cleaning of equipment. The resulting VOC emissions from cleaning are already accounted for under Emission Unit 0-0000H.

Attainment Status
PAR PHARMACEUTICAL INC is located in the town of RAMAPO in the county of ROCKLAND.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
Par Pharmaceutical, Inc. is a manufacturer as well as a research and development facility of pharmaceutical products. The facility is located in Chestnut Ridge, Rockland County, New York. Potential emissions of Volatile Organic Compounds exceed major source thresholds subjecting the facility to Title V permitting. The facility emissions of individual and total Hazardous Air Pollutants (HAPs) are limited below major source thresholds. The facility is subject to monitoring and record keeping requirement under 6NYCRR Parts 201 and 212. The Standard Industrial Code (SIC) is 2834 - Pharmaceutical Preparations.

Permit Structure and Description of Operations

The Title V permit for PAR PHARMACEUTICAL INC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

PAR PHARMACEUTICAL INC is defined by the following emission unit(s):

Emission unit 00000N - Packaging lines lines A, D, E and F. Particulate emissions are controlled by dust collector DC-07 vented to EP00035.

Emission unit 00000N is associated with the following emission points (EP):
00035
Process: PLA is located at Ground, Building 01 - Packaging of pharmaceutical products Lines A, D, E and F in support of pharmaceutical production and or R & D. Dust collector DC-07 is utilized to control particulate emissions exhausted through emission point 35.

Emission unit 00000H - This emission unit defines overall facility fugitive volatile organic compound (VOC) emissions associated with sanitizing solvents used and batch production of pharmaceutical products. Fugitive VOC emissions are assumed exhausting through emission point 00023.

Emission unit 00000H is associated with the following emission points (EP):
00023
Process: F01 is located at GROUND - Fugitive volatile organic compound (VOC) emissions associated with sanitizing solvents used and batch production of pharmaceutical products.

Emission unit 00000J - Operations associated with the granulation area. Particulate emissions are controlled by a dust collector (0DC05) exhausted to emission point 00025.

Emission unit 00000J is associated with the following emission points (EP):

00025
Process: P05 is located at GROUND - Operations associated with the granulation area.

Emission unit 00000R - Activities associated with granulation rooms No. 2, No. 4 and No. 6A. Emission sources are a portable Fitzmill, a granulator, a blender and a sifter. Air is collected from each room, routed to separate in line HEPA filters, combined, and vented to a common dust collector to control particulate emissions prior to exiting through emission point 00043.

Emission unit 00000R is associated with the following emission points (EP):
00043
Process: P11 is located at Building 01 - Process associated with granulation.

Emission unit 00000G - Aqueous based compu-lab tablet coater. Particulate emissions are controlled by a dust collector exhausted to emission point 00022.

Emission unit 00000G is associated with the following emission points (EP):
00022
Process: P03 is located at GROUND - Aqueous based compu-lab tablet coater.

Emission unit 00000E - Aqueous coating of pharmaceutical tablets. Particulate emissions are controlled by a dust collector exhausted to emission point 00020.

Emission unit 00000E is associated with the following emission points (EP):
00020
Process: P01 is located at GROUND - Aqueous coating of pharmaceutical tablets.

Emission unit 00000I - Operations associated with the compression area. Particulate emissions are controlled by a dust collector (0DC04) exhausted to emission point 00024.

Emission unit 00000I is associated with the following emission points (EP):
00024
Process: P04 is located at GROUND - Operations associated with the compression area.

Emission unit 00000A - Drying pharmaceutical products using oven No.4 and oven No.5. Products are aqueous based only.

Emission unit 00000A is associated with the following emission points (EP):
00001, 00002
Process: D01 is located at GROUND - Drying of aqueous based pharmaceutical products.

Emission unit 00000K - Chemical storage building.

Emission unit 00000K is associated with the following emission points (EP):
00031
Process: S02 Chemical storage.

Emission unit 00000U - A dust collector system will pick up particulate matter (PM) from spot areas and/or room ventilation pick up points in five new manufacturing clean rooms (MCR) (rooms 37, 38, 39, 40, & 41) (MCR37, MCR38, MCR39, MCR40, MCR41) plus one new packaging line (0PL-J) . The PM collected from this system will be manifolded and directed to a Torit dust collector (DC-20) and exhausted via Emission Point EP00049. Only aqueous products will be produced in the manufacturing clean rooms and pre made pharmaceutical products will be packaged on the packaging line 0PL-J.

Emission unit 00000U is associated with the following emission points (EP):
00049
Process: P15 is located at Ground, Building 01 - A dust collection system will pick up particulate matter (PM) from spot areas and/or room ventilation pick up points in five new manufacturing clean rooms (MCR) (rooms 37, 38, 39, 40 & 41) (MCR37, MCR38, MCR39, MCR40, MCR41) plus one new packaging line (0PL-J). The PM collected from this system will be manifolded and directed to a Torit dust collector (DC-20) and exhausted via Emission Point EP00049. Only aqueous products will be produced in the manufacturing clean rooms and pre made pharmaceutical products will be packaged on the packaging line 0PL-J.

Emission unit 00000O - Two Packaging lines B and C and one blister packaging line. Particulate emissions are controlled by dust collector DC-08 vented to EP00036.

Emission unit 00000O is associated with the following emission points (EP):
00036
Process: PLB is located at Building 01 - Packaging of pharmaceutical products Lines B, C and Blister.

Emission unit 00000C - Chemical storage room.

Emission unit 00000C is associated with the following emission points (EP):
00004
Process: S01 Chemical Storage.

Emission unit 00000T -
Drying ovens No. 6 (DRY06), No. 7 (DRY07), and No. 8 (DRY08) are used to remove isopropyl alcohol

(IPA) and/or ethanol (EtOH) from solvent-based pharmaceutical products or water from aqueous based pharmaceutical products. Solvent and aqueous modes are identified as process D03. In solvent mode, the dryers are vented to a dedicated scrubber for the first six hours of the drying cycle as follows: DRY06 vents to Scrubber No. 2 (SCR02) then exhausts via EP00006; DRY07 vents to Scrubber No. 1 (SCR01) then exhausts via EP00005; DRY08 vents to Scrubber No. 3 (SCR03) then exhausts via EP00007. Then the scrubbers will be turned off and emissions from the remaining portion of the drying cycle exhausts through a bypass vent (DRY06 to EP00008, DRY07 to EP00009, DRY08 to EP00010). When operating in aqueous mode, the dryers will exhaust via dedicated bypass vents (DRY06 to EP00008, DRY07 to EP00009, DRY08 to EP00010).

This emission unit also consists of a 48" (COAT4) and 60" (COAT7) Accela-Cota Tablet Coaters, two Glatt GPCG-60 coater/granulation/dryer units (COAT5 and COAT6), and one ACG Fluid Bed Dryer (FBD) (COAT8). Each has a dedicated fume hood (HOOD1, HOOD2, HOOD3, HOOD4, and HOOD5), which is used to dispense raw materials used in the process. Solvent mode operation is identified as one process ID (P07). IPA and/or EtOH are used in the 48" Tablet Coater, two Glatts, FBD #3, and associated fume hoods. Acetone is used in the 48" and 60" Tablet Coaters and associated fume hoods. Methanol (MeOH) is also used in the two Glatts and associated fume hoods. This equipment can be used in aqueous mode (process IDs: P08, P09, P10, P13 & P14).

The 48" Tablet Coater (COAT4) is associated with HOOD1. Particulate emissions from COAT4 are controlled by dust collector (DC-11). COAT4/HOOD1 is controlled by the carbon absorption system (CA1RR) and exhausted via EP00040 when using IPA and EtOH. When acetone is used, emissions are controlled by Condenser (COND1) and exhausted via EP00045. When operating in aqueous mode, COND1 and CA1RR are bypassed and emissions exhaust via bypass vent EP00041.

The 60" Tablet Coater (COAT7) is associated with HOOD4. Particulate emissions from COAT7 are controlled by dust collector (DC-18). When acetone is used, COAT7/HOOD4 vents to Condenser (COND2) and exhaust via EP00046. When operating in aqueous mode, COND2 is bypassed, and emissions exhaust via bypass vent EP00047.

COAT4/HOOD1 and COAT7/HOOD4 will not operate at the same time when processing acetone batchers.

Glatt #1 (COAT5) is associated with HOOD2 and Glatt #2 (COAT6) is associated with HOOD3. Particulate emissions from COAT5 and COAT6 are controlled by internal dust collectors DC-12 and DC-13, respectively. When using solvent in the Glatts and their associated fume hoods, the emissions are either directed to SCR01 and exhausted via EP00005 if IPA and/or EtOH is used or CA1RR and exhausted via EP00040 if MeOH is used. CA1RR can also be used as a backup to SCR01 when using IPA and/or EtOH in COAT5/HOOD2 and COAT6/HOOD3. This equipment can also operate in aqueous mode. When doing so, SCR01 and CA1RR are bypassed and emissions from COAT5/HOOD2 exhaust via bypass vent EP00026; and COAT6/HOOD3 exhaust via bypass vent EP00042.

FBD (COAT8) is associated with HOOD5. Particulates from COAT8 will be controlled by an internal dust collector DC-19. SCR03 will be used to reduce the solvent emissions from COAT8 and HOOD5 (EP00007). When in aqueous mode, SCR03 is bypassed and emissions from COAT8 and HOOD5 exhaust via bypass vent EP00048.

Emission unit 00000T is associated with the following emission points (EP):

00005, 00006, 00007, 00008, 00009, 00010, 00026, 00040, 00041, 00042, 00045, 00046, 00047, 00048
Process: D03 Drying ovens #283 (DRY06), #284 (DRY07), and #285 (DRY08) are used to remove isopropyl alcohol and/or ethanol from pharmaceutical products. Emissions will exhaust through wet scrubbers as follows: DRY07 to SCR01 (EP00005), DRY06 to SCR02 (EP00006), and DRY08 to SCR03 (EP00007) for the first six hours of the drying cycle. Then scrubbers will be turned off and emissions will exhaust through bypass emission points for the remainder of the drying cycle or when operating in aqueous mode as follows: DRY06 to EP00008, DRY07 to EP00009, DRY08 to EP00010.

Process: P07 is located at Building 01 - Solvent emissions from Glatt GPGC-60 #1 (COAT5), Glatt GPGC-60 #2 (COAT6), and Fume Hoods #2 and #3 (HOOD2 and HOOD3) are controlled by a wet scrubber SCR01 (EP00005) and CA1RR (EP00040) will be used as a back-up control device when isopropyl alcohol or ethanol is used. In addition, CA1RR (EP00040) will continue to be used as the primary control device for COAT5, COAT6, HOOD2, and HOOD3 when methanol is used. Glatt GPGC-60 #1 (COAT5) and Glatt GPGC-60 #2 (COAT6) vent to internal dust collectors (DC-12 & DC-13, respectively) before venting to SCR01 (EP00005) or CA1RR (EP00040).

VOC emissions from the 48" Accela-Coata tablet coater (COAT4)/fume hood #1 (HOOD1) vent to CA1RR (EP00040) when isopropyl alcohol or ethanol is used. The 48" Tablet Coater (COAT4) and Fume Hood #1 (HOOD1) vent to Condenser (COND1) and (EP00045) when acetone is used. COAT4 also vents to an external dust collector (DC-11) before venting to CA1RR (EP00040) or COND1 (EP00045).

VOC emissions from the 60" Accela-Coata tablet coater (COAT7) and Fume Hood #4 (HOOD4) vent to a Condenser (COND2) and (EP00046) when acetone is used. COAT7 will also vent to an external dust collector (DC-18) before venting to COND2 (EP00046). COAT7/HOOD4 and COAT4/HOOD1 will not be used at the same time when processing acetone batches.

VOC emissions from the ACG Fluid Bed Dryer (COAT8) and Fume Hood #5 (HOOD5) vent to wet scrubber SCR03 (EP00007) when isopropyl alcohol or ethanol is used. COAT8 will also vent to an internal dust colector DC-19 before venting to SCR03 (EP00007).

All equpment is used in pharmaceutical production and/or research & develpment purposes. All equipment can be used in solvent mode (VOCs or HAPs).

Process: P08 Glatt GPCG-60 #1 (COAT5) coater/granulator/dryer is used to coat/granulate and/or dry pharmaceutical materials for production and/or for research & development. Glatt GPCG-60 #1 (COAT5) vents to an internal dust collector (DC-12). Pharmaceutical fume hood #2 (HOOD2) is used to dispense raw materials used in the process. Both pieces of equipment vent through EP00026 when in aqueous mode.

Process: P09 is located at Building 01 - 48" Accela-Coata tablet coater (COAT4) is used to coat pharmaceutical materials for production and/or for research & development. Pharmaceutical fume hood #1 (HOOD1) is used to dispense raw materials in the process. The 48" tablet coater vents to an external stand alone dust collector (DC-11). Both pieces of equipment vent through EP00041 when in aqueous mode.

Process: P10 is located at Building 01 - Glatt GPCG-60 #2 (COAT6) coater/granulator/dryer is used to coat/granulate and/or dry pharmaceutical materials for production and/or for research & development. Glatt GPCG-60 #2 (COAT6) vents to an internal duct collector (DC-13). Pharmaceutical fume hood #3 (HOOD3) is used to dispense raw materials used in the process. Both pieces of equipment vent through EP00042 when in aqueous mode.

Process: P13 60" tablet coater (COAT7) is used to coat pharmaceutical materials for production and/or for research & development. Pharmaceutical fume hood #4 (HOOD4) is used to dispense raw materials used in

the process. COAT7 vents to an external stand alone dust collector (DC-18). Both pieces of equipment vent through EP00047 when in aqueous mode.

Process: P14 is located at Building 01 - ACG Fluid Bed Dryer #3 (COAT8) Coater/Granulator/Dryer is used to coat/granulate and/or dry pharmaceutical materials for production and/or R&D. ACG Fluid Bed Dryer #3 (COAT8) vents to an internal dust collector (DC-19). Pharmaceutical fume hood #5 (HOOD5) is used to prepare materials for the process. Both pieces of equipment vent through EP00048 when in aqueous mode.

Emission unit 00000B - Drying aqueous based pharmaceutical products using an aeromatic fluidized bed dryer. Emissions are exhausted through emission point 00003.

Emission unit 00000B is associated with the following emission points (EP):
00003
Process: D02 is located at GROUND - Drying aqueous based pharmaceutical products.

Emission unit 00000L - Operations associated with the storage of hazardous waste.

Emission unit 00000L is associated with the following emission points (EP):
00032
Process: S03 Storage of hazardous wastes.

Emission unit 00000M - This emission unit is comprised of the Compression Area (Rooms 23, 27 and 28) and relocated Pharmacy Dispensing Area (Rooms 1, 2 and 3). Negative pressure is maintained on emission sources consisting of the Pharmacy Dispensing Area room and three Compression Area tablet presses.

Particulate emissions are controlled by a DFT 2-4 PulseJet Cartridge Dust Collector (0DC16) and exhausted through Emission Point 00034.

Emission unit 00000M is associated with the following emission points (EP):
00034
Process: P06 is located at Ground - Combined process consisting of the pharmacy dispensing area and compression area activities.

Emission unit 00000S - Creams and Gels Area consisting of one - Fette 1200i tablet press, one - Woowon mixer and dust pickups in six pharmaceutical manufacturing rooms. Particulate emissions are controlled by a DFT 2-4 PulseJet Cartridge Dust Collector (DC-17).

Emission unit 00000S is associated with the following emission points (EP):
00044
Process: P12 Pharmaceutical production associated with Creams and Gel areas.

Emission unit 00000F - Aqueous coating of pharmaceutical tablets. Particulate emissions are controlled by a dust collector exhausted to emission point 00021.

Emission unit 00000F is associated with the following emission points (EP):
00021
Process: P02 is located at GROUND - Aqueous coating of pharmaceutical tablets.

Title V/Major Source Status
PAR PHARMACEUTICAL INC is subject to Title V requirements. This determination is based on the following information:
Source is major since potential to emit (PTE) for volitile organic carbons (VOC) is greater than 25 tons per year.

Program Applicability
The following chart summarizes the applicability of PAR PHARMACEUTICAL INC with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments

of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description

2834	PHARMACEUTICAL PREPARATIONS

SCC Codes
SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-01-060-09	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Air Dryers
3-01-060-10	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Storage/Transfer
3-01-060-11	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Coating Process
3-01-060-12	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Granulation Process
3-01-060-22	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS CHEMICAL MFG:PHARMACEUTICAL PRODUCTION:MISCELLANEOUS FUGITIVES
3-01-060-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Other Not Classified

Facility Emissions Summary
In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is

identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000630-08-0	CARBON MONOXIDE	21220		3235	
000067-64-1	DIMETHYL KETONE	27966		0	
000067-56-1	METHYL ALCOHOL	19000		4	
011104-93-1	NITROGEN OXIDE- (USE 0NY210-00-0)	34405		3851	
0NY075-00-0	PARTICULATES	3948		433	
007446-09-5	SULFUR DIOXIDE	136		23	
0NY100-00-0	TOTAL HAP	49000		9	
0NY998-00-0	VOC	73043		15388	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or

termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)
This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable

requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location	Regulation	Condition	Short Description
Facility/EU/EP/Process/ES			

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FACILITY	ECL 19-0301	35	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	36	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13, 14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	15	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 33, 34	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	16	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	1 -1	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	23	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	24	Permit Shield
FACILITY	6NYCRR 201-7	25, 3 -6	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	28	General Prohibitions

FACILITY	6NYCRR 211.2	37	- air pollution prohibited General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.6(a)	2 -3	Limiting of Opacity
FACILITY	6NYCRR 212-1.7(b)(3)	2 -4	The VOC outlet concentration from fixed-bed carbon adsorption units
FACILITY	6NYCRR 212-2.3(b)	2 -7, 2 -8	State Air Program Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 212-2.4(b)	3 -4	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 212-3.1(c)(4)(i)	3 -5	RACT compliance plan control limits for Capture and Control
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions

Applicability Discussion:
Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department

representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all

calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 201-6.4 (g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, PAR PHARMACEUTICAL INC has been determined to be subject to the following regulations:
6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-1.6 (a)
This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-1.7 (b) (3)
This paragraph requires the source owner to monitor the VOC outlet concentration of the fixed-bed carbon adsorption unit to demonstrate on-going compliance.

6 NYCRR 212-2.3 (b)
Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)
Particulate emissions from any process emission source, which received a B or C

Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 212-3.1 (c) (4) (i)

This provision states that owners and/or operators of emission points subject to Part 212-3 operating prior to October 20, 1994 must submit a compliance plan to the department. The compliance plan must demonstrate that the VOC emission points are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is to limit the emissions of acetone to 19,000 pounds per year, limit the emissions of Total HAPs to 49,000 pounds per year, and limit the VOC emissions by capping the sovent based batches that are produced to 100 batches per year.

Non Applicability Analysis
List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR Part 63, Subpart GGG	Pharmaceutical MACT

Reason: The facility does not emit greater than 10 tons per year of an individual Hazardous Air Pollutant or greater than 25 tons per year of total Hazardous Air Pollutants. Therefore, the facility is not subject to the National Emission Standards for Pharmaceutical Production as defined in 40 CFR 63.GGG.1250(a).

FACILITY	6 NYCRR Part 233	Pharmaceutical and Cosmetic Manufacturing Processes

Reason: The facility does not engage in chemical synthesis and is therefore

not subject to Part 233. Packaging and formulation is not considered to be synthesized pharmaceutical manufacturing as defined in 233.2(13) of the regulation.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification
Summary of monitoring activities at PAR PHARMACEUTICAL INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	14	work practice involving specific operations
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	3-1	work practice involving specific operations
FACILITY	2-2	monitoring of process or control device parameters as surrogate
FACILITY	3-2	work practice involving specific operations
FACILITY	3-3	work practice involving specific operations
0-0000T	3-7	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	2-3	monitoring of process or control device parameters as surrogate
FACILITY	2-4	monitoring of process or control device parameters as surrogate
FACILITY	2-7	intermittent emission testing
FACILITY	2-8	intermittent emission testing
FACILITY	3-4	intermittent emission testing
FACILITY	3-5	intermittent emission testing

Basis for Monitoring
Particulate emissions are limited to 0.05 grains per dscf. Performance testing to verify compliance shall be conducted at the discretion of the Department. This is based on low particulate emission rates attibutable to the operation of numerous dust collectors and scrubber control devices.

Opacity is limited to 20 percent. Formal method 9 observations to verify compliance shall be conducted at the discretion of the Department based on low particulate and VOC emission rates. However, the facility must conduct a monthly visual survey and perform corrective action as needed.

VOC RACT of 81 percent capture and control applies. Performance testing to verify compliance shall be

conducted at the discretion of the Department. This is based on the function of process equipment, exhaust and control devices employed. Also, a 5 year historic facility emissions are averaging less than 8 tons VOC per year.

The VOC monitoring requirement that applies to the carbon adsorption system is based on reasonable engineering practice to identify cycles of needed maintenance or repair. The concentration of 150 ppm VOC is an indicator established as part of previous permit actions.

The Glatt 1 and Glatt 2 solvent based commercial batches limit of 100 per year is based on a historical permit action to avoid New Source Review nonattainment implications.