



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6307-00006/00014
Effective Date: 01/26/2017 Expiration Date: 01/25/2022

Permit Issued To: EPIC PHARMA LLC
227-15 N CONDUIT AVE
SPRINGFIELD GARDENS, NY 11413

Contact: MANOJ PATEL
EPIC PHARMA LLC
227-15 N CONDUIT AVE
SPRINGFIELD GARDENS, NY 11413
(718) 276-8600

Facility: EPIC PHARMA LLC
227-15 N CONDUIT AVE
LAURELTON, NY 11413

Contact: MANOJ PATEL
EPIC PHARMA LLC
227-15 N CONDUIT AVE
SPRINGFIELD GARDENS, NY 11413
(718) 276-8600

Description:
EPIC PHARMA LLC operates a pharmaceutical formulation and preparation plant located in Laurelton, New York. The facility produces pharmaceutical tablets and capsules.

The air emission sources include oven drying and wet mixing (EU 1-OVNWM); film coating (EU 2-COATG); dry mixing, tablets compression and encapsulation (EU 3-DRYMH); seeds manufacturing (EU 4-SEEDS); and fluid bed granulation/drying (EU5-FLUID). Different materials required for a product are weighed in the Pharmacy Department. Some of these are then mixed together in the Mixing Department. Certain of the materials from the Mixing Department are dried and compressed into tablets or are filled into gelatin capsule shells. Some tablets are coated to make a smooth colored finish, and other are mixed to make time-release seeds which are then encapsulated.

Under Title V permit renewal, the Volatile Organic Compounds (VOC) emissions increased by 2.45 tons per year on a 12-month rolling basis. With this increase the VOC emissions for the facility are capped to 37.45 tons per year on a twelve month rolling basis and this is carried over to the Title V Permit renewal 2.

New York State Department of Environmental Conservation
Facility DEC ID: 2630700006



By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: STEPHEN A WATTS
 47-40 21ST ST
 LONG ISLAND CITY, NY 11101-5401

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal -
REGION 2 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal - REGION 2 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 2 Headquarters
Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street
Long Island City, NY 11101-5407
(718) 482-4997

New York State Department of Environmental Conservation

Permit ID: 2-6307-00006/00014

Facility DEC ID: 2630700006



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: EPIC PHARMA LLC
227-15 N CONDUIT AVE
SPRINGFIELD GARDENS, NY 11413

Facility: EPIC PHARMA LLC
227-15 N CONDUIT AVE
LAURELTON, NY 11413

Authorized Activity By Standard Industrial Classification Code:
2834 - PHARMACEUTICAL PREPARATIONS
6512 - NONRESIDENTIAL BUILDING OPERATORS

Permit Effective Date: 01/26/2017

Permit Expiration Date: 01/25/2022



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 23 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *24 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *26 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 27 6 NYCRR 211.1: Air pollution prohibited
- 28 6 NYCRR 233.1 (f): Pharmaceutical And Cosmetic Manufacturing Processes Applicability
- 29 6 NYCRR 233.3 (h): Compliance Certification

Emission Unit Level

- 30 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 31 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=1-OVNWM

- 32 6 NYCRR 212-2.4 (a): Compliance Certification

EU=2-COATG

- 33 6 NYCRR 212-2.4 (a): Compliance Certification

EU=3-DRYMH

- 34 6 NYCRR 212-2.4 (a): Compliance Certification



EU=4-SEEDS

35 6 NYCRR 212-2.4 (a): Compliance Certification

EU=5-FLUID

36 6 NYCRR 212-2.4 (a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

37 ECL 19-0301: Contaminant List

38 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

39 6 NYCRR 211.2: Visible Emissions Limited

40 6 NYCRR 212-2.3 (b): Compliance Demonstration

41 6 NYCRR 212-2.3 (b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

- 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 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 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 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 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 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 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 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 201-6.7 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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 01/26/2017 and 01/25/2022**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of



Condition 5: Compliance Certification
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring



report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate



whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related record keeping and reporting requirements of this permit;
 - such other facts as the Department may require to



determine the compliance status of the facility as specified in any special permit terms or conditions; and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
Hunters Point Plaza
47-40 21st Street
Long Island City, NY 11101-5407

The address for the BQA is as follows:

New York State Department of Environmental Conservation

Permit ID: 2-6307-00006/00014

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NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission
statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the
department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 215.2



Item 9.1:

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

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**



The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility



Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information

Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: Right to Inspect

Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Off Permit Changes



Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

Item 17.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 18.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 19: Accidental release provisions.
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:40 CFR Part 68

Item 19.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

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1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 20: Recycling and Emissions Reduction
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 21: Emission Unit Definition
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-OVNWM

Emission Unit Description:

UNIT 1: OVENS/WET MIXING. CHEMICALS ARE MIXED AND BLENDED WITH ALCOHOL IN WET MIXERS IN THE MIXING DEPARTMENT (A SIZE 14 ROTOCONE IS USED TO CONTROL PARTICULATE EMISSIONS FROM WET MIXING AREA). THE MOIST BLEND IS REMOVED TO DRYING OVENS (OVENS 4, 5 AND 6) THAT ARE DUCTED TO A WET SCRUBBER FOR CERTAIN PRODUCT LINES TO CONTROL HCL EMISSIONS). MIXING/MILLING/TRAYING OF HCL PRODUCTS DUCTED TO WET SCRUBBER.

Building(s): MAIN

Item 21.2:

The facility is authorized to perform regulated processes under this permit for:

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Emission Unit: 2-COATG

Emission Unit Description:

UNIT 2: TABLETS ARE COATED WITH A COLORED SURFACE COATING IN COATING MACHINES. ALL TABLET COATING PRODUCTS ARE WATER-BASED.

Building(s): MAIN

Item 21.3:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 3-DRYMH

Emission Unit Description:

UNIT 3: POWDERED (DRY) INGREDIENTS ARE MIXED, GROUND, AND BLENDED IN MIXERS. UNIT ALSO INCLUDES TABLET COMPRESSION AND ENCAPSULATION OPERATIONS. PARTICULATE EMISSIONS ARE CONTROLLED BY 3 CYCLONES, 3 BAGHOUSES, AND 2 FABRIC COLLECTORS. FUGITIVE DUST EMISSIONS ARE NEGLIGIBLE SINCE THIS MANUFACTURING AREA OPERATES UNDER A SLIGHT NEGATIVE PRESSURE.

Building(s): MAIN

Item 21.4:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 4-SEEDS

Emission Unit Description:

UNIT 4: NEUTRAL PELLETS ARE TUMBLED IN PANS WHILE OTHER INGREDIENTS ARE APPLIED WITH A SOLUTION. PARTICULATES EMISSIONS ARE CONTROLLED BY A ROTOCONE. FUGITIVE EMISSIONS ARE NEGLIGIBLE.

Building(s): MAIN

Item 21.5:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 5-FLUID

Emission Unit Description:

UNIT 5: FLUID BED. FLUID BED USED TO MAKE AND DRY THE GRANULATION.

Building(s): MAIN

Condition 22: Progress Reports Due Semiannually
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement: 6 NYCRR 201-6.4 (d) (4)

Item 22.1:

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On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 24.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 24.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 24.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility has proposed to cap VOC emissions to 37.45 tons per year on a 12 month rolling basis to avoid New Source Review applicability.

Under the previously issued Air State Facility permit, EPIC PHARMA LLC was allowed to emit 24.9 tons VOC per year on a 12 month rolling basis. Under the initial Air Title V permit, EPIC PHARMA LLC proposed and received a net increase of VOC emissions of 10.1 tons per year on 12 month rolling basis.

VOCs are comprised primarily of isopropyl alcohol and ethanol. FDA Good manufacturing Practices regulation tightly restrict the type of chemicals used for cleaning and manufacturing in pharmaceutical operations.

Under this Title V renewal 1 permit application, the owner is proposing an additional increase of VOC emissions of 2.45 tons per year on a 12 moth rolling basis.

The owner shall maintain records of the VOC emission by material balance calculations monthly and submit such records to the Department semiannually:

Pounds of VOC purchased minus pounds of VOC inventory =
Pounds of VOC emitted

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Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

Item 25.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Total HAP emissions are limited to 24.9 tons per year as long as there is no contravention of 6NYCRR requirements. For example the applicant is proposing to emit 1.35 pounds per hour and 1500 pounds per year hydrogen chloride after controls to comply with 6NYCRR part 212.

Purchase, consumption, inventory and emissions of each and total HAP(s) must be maintained at the facility for a period of 5 years, and made available to DEC upon request.

Each individual HAP should be identified and emissions shall be reported to DEC semiannually.

Individual HAP emissions shall be calculated by material balance:

Each Individual HAP purchased - Each Individual HAP Consumed - Each Individual HAP controlled = Each Individual HAP Emissions.

At the present only one HAP, hydrogen chloride, has be reported by the facility.

If and when other HAP(s) are introduced at the facility, an application to modify this present permit must be submitted to DEC for compliance with Part 212.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 24.9 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).

Condition 26: Capping Monitoring Condition

Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-7

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Purchase, consumption, inventory and emissions of each and total HAP(s) must be maintained at the facility for a period of 5 years, and made available to DEC upon request.

Each individual HAP should be identified and emissions shall be reported to DEC semiannually.

Individual HAP emissions shall be calculated by material balance:

Each Individual HAP purchased - Each Individual HAP Consumed - Each Individual HAP controlled = Each Individual HAP Emissions.

At the present only one HAP, hydrogen chloride, has been reported by the facility.

If and when other HAP(s) are introduced at the facility, an application to modify this present permit must be submitted to DEC for compliance with Part 212.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 9.9 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Air pollution prohibited
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 211.1

Item 27.1:

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. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 28: Pharmaceutical And Cosmetic Manufacturing Processes
Applicability

Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 233.1 (f)

Item 28.1:

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Any process that is subject to the provisions of this Part will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.

Condition 29: Compliance Certification
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement: 6 NYCRR 233.3 (h)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

A variance request is made by the applicant and is pending EPA's approval to install air pollution control equipment to control volatile organic compounds in the Pharmaceutical processes due to technical and economic reasons.

According to Part 233.1(f) any process that is subject to the provisions of this part will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.

The owner shall maintain records for 5 years and submit records to the Department semiannually of the VOC emissions by material balance calculations monthly:

Pounds of VOC purchased minus pounds of VOC Inventory =
Pounds of VOC emitted

The annual rolled monthly VOC emissions shall be submitted to DEC semiannually.

Parameter Monitored: VOC

Upper Permit Limit: 37.45 tons per year

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

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Item 30.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 3-DRYMH

Emission Point: 00013

Height (ft.): 5 Diameter (in.): 16

NYTMN (km.): 4502.5 NYTME (km.): 605.8 Building: MAIN

Emission Point: 00014

Height (ft.): 10 Length (in.): 23 Width (in.): 28

NYTMN (km.): 4502.5 NYTME (km.): 605.8 Building: MAIN

Emission Point: 00015

Height (ft.): 2 Diameter (in.): 2

NYTMN (km.): 4502.5 NYTME (km.): 605.8 Building: MAIN

Emission Point: 00016

Height (ft.): 26 Length (in.): 30 Width (in.): 30

NYTMN (km.): 4502.5 NYTME (km.): 605.8 Building: MAIN

Emission Point: 00017

Height (ft.): 27 Length (in.): 30 Width (in.): 30

NYTMN (km.): 4502.5 NYTME (km.): 605.8 Building: MAIN

Item 30.4:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 4-SEEDS

Emission Point: 00010

Height (ft.): 22 Diameter (in.): 18

NYTMN (km.): 4502.5 NYTME (km.): 605.8 Building: MAIN

Item 30.5:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 5-FLUID

Emission Point: 00020

Height (ft.): 25 Diameter (in.): 8

NYTMN (km.): 4502.5 NYTME (km.): 605.8 Building: MAIN

Condition 31: Process Definition By Emission Unit

Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 31.1:

This permit authorizes the following regulated processes for the cited Emission Unit:



Emission Unit: 1-OVNWM
Process: OVN Source Classification Code: 3-01-060-99

Process Description:
OVEN DRYING: FOLLOWING WET MIXING,
PRODUCT IS DRIED IN ONE OF THE STEAM-HEATED
OVENS. PRODUCTS CONTAINING HCl ARE DRIED
IN OVEN 4, 5, OR 6 AND EMISSIONS ARE DUCTED
TO THE WET SCRUBBER.

Emission Source/Control: CD110 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 1OVEN - Process

Emission Source/Control: 2OVEN - Process

Emission Source/Control: 3OVEN - Process

Emission Source/Control: 4OVEN - Process

Emission Source/Control: 5OVEN - Process

Emission Source/Control: 6OVEN - Process

Emission Source/Control: HCLMX - Process

Item 31.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-OVNWM
Process: WMG Source Classification Code: 3-01-060-99

Process Description:
WET MIXING: ALCOHOLS ARE MIXED WITH
POWDERED MATERIALS IN THE MIXING
DEPARTMENT.

Emission Source/Control: CD001 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 00WM1 - Process

Emission Source/Control: 00WM2 - Process

Emission Source/Control: 00WM3 - Process

Emission Source/Control: 00WM4 - Process

Emission Source/Control: 00WM5 - Process

Emission Source/Control: 00WM6 - Process

Item 31.3:



This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-COATG
Process: CTG Source Classification Code: 3-01-060-11
Process Description:
SURFACE COATING: TABLETS ARE FILM COATED
IN THE ACELA COTA MACHINES BY TUMBLING
THEM, IN A SPRAY MIXTURE OF WATER AND
COLORS. PARTICULATE CONTAMINANTS ARE
REMOVED FROM THE EXHAUST AIR BY SEPARATE
FILTER CARTRIDGES FOR EACH COATER.

Emission Source/Control: CD006 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CD007 - Control
Control Type: FABRIC FILTER

Emission Source/Control: COAT1 - Process

Emission Source/Control: COAT2 - Process

Item 31.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 3-DRYMH
Process: DMX Source Classification Code: 3-01-060-99
Process Description:
DRY MIXING: DRY INGREDIENTS ARE MIXED,
GROUND, AND BLENDED IN TWIN MIXERS OR
BLENDERS.

Emission Source/Control: CDC13 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CDC14 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CDC15 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: OBH13 - Control
Control Type: FABRIC FILTER

Emission Source/Control: OBH14 - Control
Control Type: FABRIC FILTER

Emission Source/Control: ODC17 - Control
Control Type: FABRIC FILTER

Emission Source/Control: ENCAP - Process



Emission Source/Control: ODMIX - Process

Item 31.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 3-DRYMH
Process: ECN Source Classification Code: 3-01-060-99
Process Description:
ENCAPSULATION: CAPSULES ARE FILLED WITH
PREPARED INGREDIENTS FROM THE GRANULATION
OR SEED DEPARTMENT.

Emission Source/Control: CDC13 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CDC14 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CDC15 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: OBH13 - Control
Control Type: FABRIC FILTER

Emission Source/Control: OBH14 - Control
Control Type: FABRIC FILTER

Emission Source/Control: OBH15 - Control
Control Type: FABRIC FILTER

Emission Source/Control: ENCAP - Process

Item 31.6:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 3-DRYMH
Process: TCP Source Classification Code: 3-01-060-99
Process Description:
TABLET COMPRESSION: POWDERED INGREDIENTS
ARE COMPRESSED INTO TABLETS.

Emission Source/Control: CDC13 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CDC14 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CDC15 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: OBH13 - Control
Control Type: FABRIC FILTER

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Emission Source/Control: OBH14 - Control
Control Type: FABRIC FILTER

Emission Source/Control: ODC16 - Control
Control Type: FABRIC FILTER

Emission Source/Control: ENCAP - Process

Emission Source/Control: TCOMP - Process

Item 31.7:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 4-SEEDS
Process: SDS
Source Classification Code: 3-01-060-99
Process Description:

SEEDS MANUFACTURE: NEUTRAL PELLETS ARE
TUMBLED IN PANS WHILE INGREDIENTS ARE
APPLIED TO CREATE MULTIPLE LAYERS.
PARTICULATE EMISSIONS ARE CONTROLLED BY A
ROTOCLONE (SIZE 20).

Emission Source/Control: CDO10 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: OPANS - Process

Item 31.8:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 5-FLUID
Process: FLD
Source Classification Code: 3-01-060-99
Process Description:

POWDERS ARE SUSPENDED IN A FILTERED AIR
STREAM AND GRANULATED OR DRIED.

Emission Source/Control: CD020 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: FLBED - Process

Condition 32: Compliance Certification
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 212-2.4 (a)

Item 32.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-OVNWM



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DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 212-2.4 (a)

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-DRYMH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement:6 NYCRR 212-2.4 (a)

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-SEEDS

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Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Certification

Effective between the dates of 01/26/2017 and 01/25/2022

Applicable Federal Requirement: 6 NYCRR 212-2.4 (a)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: 5-FLUID

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

New York State Department of Environmental Conservation

Permit ID: 2-6307-00006/00014

Facility DEC ID: 2630700006



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

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 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



emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 39: Visible Emissions Limited
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable State Requirement:6 NYCRR 211.2

Item 39.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 40: Compliance Demonstration
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable State Requirement:6 NYCRR 212-2.3 (b)

Item 40.1:

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The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 40.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

For this contaminant, the degree of air cleaning required depends on the assigned Environmental Rating and the Emission Rate Potential (ERP).

The Environmental Rating assigned to this contaminant, with an ERP of 40.63 pounds per hour as reported in the June 8, 2005, and revised to 27.08 pounds per hour in the August 23, 2005 correspondences from Bodnar Environmental to NYS Department of Environmental Conservation Division of Environmental Permits, and Table 1 of 6NYCRR Part 212-1.3, is "A".

According to Table 2 of 6NYCRR Part 212-2.3(B), the degree of air cleaning required is 99% or greater or BACT.

For this "A" rated contaminant, the removal efficiency shall be determined by testing for HCl at the inlet and outlet of the air pollution control device, in this case a scrubber, utilizing DEC acceptable procedures.

Test protocol and testing shall be conducted in accordance to Part 202-1.

In the August 23, 2005 correspondences from Bodnar Environmental to NYS Department of Environmental Conservation Division of Environmental Permits, the PTE reported is 1.35 pounds per hour and 1500 pounds per year.

The HCL emissions from this facility is limited to 1.35 pounds per hour and 1500 pounds per year on a 12 month rolling period.

Hydrogen Chloride emissions shall be calculated as follows:

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Hydrogen Chloride emissions = Hydrogen Chloride purchased
- Hydrogen Chloride consumed - Hydrogen
Chloride controlled.

Manufacturer Name/Model Number: MET PRO CORPORATION, MODEL PT506-1086 -
SCUBBER

Parameter Monitored: HYDROGEN CHLORIDE

Upper Permit Limit: 1500 pounds per year

Reference Test Method: EPA METHODS

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2017.

Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Demonstration
Effective between the dates of 01/26/2017 and 01/25/2022

Applicable State Requirement: 6 NYCRR 212-2.3 (b)

Item 41.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 1-OVNWM Emission Point: 00110

Regulated Contaminant(s):
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 41.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

For this contaminant, the degree of air cleaning required depends on the assigned Environmental Rating and the Emission Rate Potential (ERP).

The Environmental Rating assigned to this contaminant, with an ERP of 40.63 pounds per hour as reported in the June 8, 2005, and revised to 27.08 pounds per hour in the August 23, 2005 correspondences from Bodnar Environmental to NYS Department of Environmental Conservation Division of Environmental Permits, and Table 1 of 6NYCRR Part 212-1.3, is "A".

According to Table 2 of 6NYCRR Part 212-2.3(b), the degree of air cleaning required is 99% or greater

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or
BACT.

For this "A" rated contaminant, the removal efficiency shall be determined by testing for HCl at the inlet and outlet of the air pollution control device, in this case a scrubber, utilizing DEC acceptable procedures.

Test protocol and testing shall be conducted in accordance to Part 202-1.

In the August 23, 2005 correspondences from Bodnar Environmental to NYS Department of Environmental Conservation Division of Environmental Permits, the PTE reported is 1.35 pounds per hour and 1500 pounds per year.

The HCL emissions from this facility is limited to 1.35 pounds per hour and 1500 pounds per year on a 12 month rolling period.

Manufacturer Name/Model Number: Met Pro Corporation, Model PT506-1086 - Scrubber

Upper Permit Limit: 1.35 pounds per hour

Reference Test Method: EPA Methods

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE