

**New York State Department of Environmental Conservation
Facility DEC ID: 8263200048**



**PERMIT
Under the Environmental Conservation Law (ECL)**

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
8-2632-00048/00041
Effective Date: 07/27/1999 Expiration Date: No expiration date

Permit Issued To: UCB MANUFACTURING INC
755 JEFFERSON RD
ROCHESTER, NY 14623

JEFFREY J HOHMAN
UCB MANUFACTURING INC
755 JEFFERSON RD
ROCHESTER, NY 14623
(585) 274-5819

Facility: UCB MANUFACTURING INC
755 JEFFERSON RD
ROCHESTER, NY 14623

Description:
Air State Facility Permit for existing pharmaceutical production and coating operations. As part of this Permit, Medeva Pharmaceuticals has agreed to continue to comply with Special Permit Conditions which will continue to restrict facility Potentials to Emit hazardous air pollutants (HAP) and volatile organic compounds (VOC) to below the thresholds of applicability of:
6 NYCRR Part 201-6 (Title V) for a Major Stationary Source,
6 NYCRR Part 233 VOC RACT for Pharmaceutical Manufacturing Processes, and
40 CFR Part 63 Subpart GGG Proposed Pharmaceutical MACT Standards for HAP.

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: PETER A LENT
DIVISION OF ENVIRONMENTAL PERMITS
6274 EAST AVON LIMA RD
AVON, NY 14414-9519

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 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 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

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Relationship of this Permit to Other Department Orders and Determinations

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 8
HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
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: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Item 2.1:

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 2.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Condition 3: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 3.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or

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d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

Condition 4: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 4.1:

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.

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 8 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(716) 226-2466



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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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755 JEFFERSON RD
ROCHESTER, NY 14623

Facility: UCB MANUFACTURING INC
755 JEFFERSON RD
ROCHESTER, NY 14623

Authorized Activity By Standard Industrial Classification Code:
2834 - PHARMACEUTICAL PREPARATIONS



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 3 6NYCRR 200.7: Maintenance of equipment
- 4 6NYCRR 201-1.1(a): Contaminant List
- 5 6NYCRR 201-1.2: Unpermitted Emission Sources
- 6 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 7 6NYCRR 201-1.5: Emergency Defense
- 8 6NYCRR 201-1.7: Recycling and Salvage
- 9 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected
Contaminants to the Air
- 10 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 11 6NYCRR 201-3.2(a): Proof of Eligibility
- 12 6NYCRR 201-3.3(a): Proof of Eligibility
- 13 6NYCRR 201-6: Facility Permissible Emissions
- *14 6NYCRR 201-6: Compliance Demonstration
- *15 6NYCRR 201-6: Compliance Demonstration
- *16 6NYCRR 201-6: Compliance Demonstration
- 17 6NYCRR 202-1.1: Required emissions tests
- 18 6NYCRR 211.3: Visible emissions limited.
- 19 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction

Emission Unit Level

EU=0-00001

- 21 6NYCRR 212.4(c): Compliance Demonstration
- 22 6NYCRR 212.6(a): Compliance Demonstration

EU=0-00004

- 23 6NYCRR 212.4(c): Compliance Demonstration
- 24 6NYCRR 212.6(a): Compliance Demonstration

EU=0-00005

- 27 6NYCRR 227-1.3(a): Compliance Demonstration
- 25 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
- 26 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Demonstration

EU=0-00006

- 28 6NYCRR 212.4(c): Compliance Demonstration
- 29 6NYCRR 212.6(a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

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Facility Level

- 30 6NYCRR 201-5: General Provisions
- 31 6NYCRR 201-5: Emission Unit Definition
- 32 6NYCRR 211.2: Air pollution prohibited
- 33 6NYCRR 217-3.2(a): Diesel truck opacity limitation
- 34 6NYCRR 217-3.2(b): Idling of diesel trucks limited

Emission Unit Level

- 35 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 36 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping. Permit Effective Date: 07/27/1999
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FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 1: Sealing
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

(b) No person shall operate any air contamination source sealed by the commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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 emission control required.

Condition 3: Maintenance of equipment
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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.

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Condition 4: Contaminant List

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.1(a)

Item 4.1:

Emissions of the following contaminants are allowed under this permit.

CAS No: 000056-23-5

Name: CARBON TETRACHLORIDE

CAS No: 000067-56-1

Name: METHYL ALCOHOL

CAS No: 000067-66-3

Name: CHLOROFORM

CAS No: 000068-12-2

Name: FORMAMIDE, N,N-DIMETHYL

CAS No: 000075-05-8

Name: ACETONITRILE

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 000100-44-7

Name: BENZYL CHLORIDE

CAS No: 000107-06-2

Name: 1,2-DICHLOROETHANE

CAS No: 000107-21-1

Name: 1,2-ETHANEDIOL

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 000110-54-3

Name: HEXANE

CAS No: 000121-69-7

Name: BENZENAMINE, N, N-DIMETHYL

CAS No: 000630-08-0

Name: CARBON MONOXIDE

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CAS No: 001634-04-4
Name: METHYL TERTBUTYL ETHER

CAS No: 007446-09-5
Name: SULFUR DIOXIDE

CAS No: 007782-50-5
Name: CHLORINE

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY100-00-0
Name: HAP

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0
Name: VOC

Item 4.2:

The Facility is authorized to emit the regulated contaminants cited in Item 4.1 from the emission units specified in this permit.

Condition 5: Unpermitted Emission Sources
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 5.1:

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Condition 6: Unavoidable Noncompliance and Violations
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.4



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Item 6.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit or certificate issued for the corresponding air contamination source. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

Condition 7: Emergency Defense
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 7.1:

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.



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(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 and/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;

(3) During the period of the emergency the facility owner and/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 and/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 and/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.

Condition 8: Recycling and Salvage
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 8.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Condition 9: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 9.1:

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 10: Public Access to Recordkeeping
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.10(a)

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Item 10.1:

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Condition 11: Proof of Eligibility

Effective between the dates of 07/27/1999 and Permit Expiration Date

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

Item 11.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Condition 12: Proof of Eligibility

Effective between the dates of 07/27/1999 and Permit Expiration Date

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

Item 12.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Condition 13: Facility Permissible Emissions

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 13.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following



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Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000075-09-2 PTE: 19,800 pounds per year
Name: DICHLOROMETHANE

CAS No: 0NY100-00-0 PTE: 49,800 pounds per year
Name: HAP

CAS No: 0NY998-00-0 PTE: 99,800 pounds per year
Name: VOC

Condition 14: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 14.2:

Compliance Demonstration shall include the following monitoring:

- Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
- 1) Total emissions of Volatile Organic Compounds (VOCs) from this facility must remain below 99,800 pounds per year on a 12-month rolling basis.
 - 2) Total emissions of any individual Hazardous Air Pollutant (HAP) from this facility must remain below 19,800 pounds per year on a 12-month rolling basis. Total aggregate HAPs from this facility must remain below 49,800 pounds per year on a 12-month rolling basis.
 - 3) This facility shall utilize a carbon adsorption system to service all production coating operations on the GPCG-60 production coating towers, the existing coating towers, and the GPCG-5 R&D coating tower (Emissions Unit 00001). The adsorption system shall operate with a minimum MeCl and VOC control efficiency of 96%. The adsorption system shall operate with a minimum acetone control efficiency of 94%. Medeva shall use, maintain and

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regenerate the carbon adsorption system consistent with the manufacturer's recommendations, and good engineering practice.

4) These limits will maintain VOC, single HAP, and multiple HAP emissions from this facility below the 6NYCRR Part 201 Major Stationary Source thresholds of 50, 10, and 25 tons per year, respectively. These limitations will also limit Medeva emissions below applicability thresholds of 6 NYCRR Part 233, and 40 CFR Part 63 Subpart GGG.

5) Production records will be maintained in a centralized location for the following emissions units:

00001: Two GPCG-60, GPCG-5, and existing coating towers/fluid bed dryers;

00002: GPCG-3 coating tower/fluid bed dryer and development fluid bed dryer;

00004: Methylphenidate process.

Production records will include the following parameters:

Coating Operations:

number of batches run;
batch loading rate (grams per batch);
coating solution utilized (coating towers only);
grams of solvent per gram of resin used per

batch.

Methylphenidate Process:

number of batches run;
batch loading rate (grams per batch);
liters of Isopropyl Alcohol per batch (methylphenidate

only).

6) A log will be maintained which records the monthly and annual amount of total VOCs and HAPs emitted from each of the above production processes, and the cumulative facility total. Annual emissions will be based on a rolling 12-month total.

7) Medeva shall utilize an analyzer/sampling system consisting of a total hydrocarbon flame ionization detector (FID) to monitor for hydrocarbon breakthrough at the outlet of the adsorption system. The FID shall be calibrated to measure parts per million (PPM) of methylene

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chloride. The analyzer/sampling system shall be designed to ensure that each carbon vessel is regenerated at intervals necessary to maintain the adsorption system's required control efficiency (96% for methylene chloride, and 94% for acetone).

- 8) All required records must be maintained on-site for a minimum period of 5 years.
- 9) These records must be made available to representatives of the Department upon request .
- 10) Department representatives must be granted access to the facility during normal business hours for the purpose of determining compliance with these conditions and any other state and federal air pollution control requirements, regulations or law.
- 11) On an annual basis, 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 this emissions cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with 6NYCRR Part 228 .
- 12) The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or compliance with 6NYCRR Parts 231, 233 and 40 CFR 63 Subpart GGG constitutes a violation of 6NYCRR Part 201 and of the Act.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/25/2000 for the period 07/27/1999 through 07/26/2000

Condition 15: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 15.1:



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The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- 1) Total emissions of Volatile Organic Compounds (VOCs) from this facility must remain below 99,800 pounds per year on a 12-month rolling basis.
- 2) Total emissions of any individual Hazardous Air Pollutant (HAP) from this facility must remain below 19,800 pounds per year on a 12-month rolling basis. Total aggregate HAPs from this facility must remain below 49,800 pounds per year on a 12-month rolling basis.
- 3) This facility shall utilize a carbon adsorption system to service all production coating operations on the GPCG-60 production coating towers, the existing coating towers, and the GPCG-5 R&D coating tower (Emissions Unit 00001). The adsorption system shall operate with a minimum MeCl and VOC control efficiency of 96%. The adsorption system shall operate with a minimum acetone control efficiency of 94%. Medeva shall use, maintain and regenerate the carbon adsorption system consistent with the manufacturer's recommendations, and good engineering practice.
- 4) These limits will maintain VOC, single HAP, and multiple HAP emissions from this facility below the 6NYCRR Part 201 Major Stationary Source thresholds of 50, 10, and 25 tons per year, respectively. These limitations will also limit Medeva emissions below applicability thresholds of 6 NYCRR Part 233, and 40 CFR Part 63 Subpart GGG.
- 5) Production records will be maintained in a centralized location for the following emissions units:
 - 00001: TWO GPCG-60, GPCG-5, and existing coating towers/fluid bed dryers;
 - 00002: GPCG-3 coating tower/fluid bed dryer and

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development fluid bed dryer;
00004: Methylphenidate process.

Production records will include the following parameters:

Coating Operations:

number of batches run;
batch loading rate (grams per batch);
coating solution utilized (coating towers only);
grams of solvent per gram of resin used per
batch.

Methylphenidate Process:

number of batches run;
batch loading rate (grams per batch);
liters of Isopropyl Alcohol per batch (methylphenidate
only).

6) A log will be maintained which records the monthly and annual amount of total VOCs and HAPs emitted from each of the above production processes, and the cumulative facility total. Annual emissions will be based on a rolling 12-month total.

7) Medeva shall utilize an analyzer/sampling system consisting of a total hydrocarbon flame ionization detector (FID) to monitor for hydrocarbon breakthrough at the outlet of the adsorption system. The FID shall be calibrated to measure parts per million (PPM) of methylene chloride. The analyzer/sampling system shall be designed to ensure that each carbon vessel is regenerated at intervals necessary to maintain the adsorption system's required control efficiency (96% for methylene chloride, and 94% for acetone).

8) All required records must be maintained on-site for a minimum period of 5 years.

9) These records must be made available to representatives of the Department upon request .

10) Department representatives must be granted access to the facility during normal business hours for the purpose of determining compliance with these conditions and any other state and federal air pollution control requirements, regulations or law.

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11) On an annual basis, 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 this emissions cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with 6NYCRR Part 233 .

12) The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or compliance with 6NYCRR Parts 231, 233 and 40 CFR 63 Subpart GGG constitutes a violation of 6NYCRR Part 201 and of the Act.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/25/2000 for the period 07/27/1999 through 07/26/2000

Condition 16: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1) Total emissions of Volatile Organic Compounds (VOCs) from this facility must remain below 99,800 pounds per year on a 12-month rolling basis.

2) Total emissions of any individual Hazardous Air Pollutant (HAP) from this facility must remain below

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19,800 pounds per year on a 12-month rolling basis. Total aggregate HAPs from this facility must remain below 49,800 pounds per year on a four quarter rolling basis.

3) This facility shall utilize a carbon adsorption system to service all production coating operations on the GPCG-60 production coating towers, the existing coating towers, and the GPCG-5 R&D coating tower (Emissions Unit 00001). The adsorption system shall operate with a minimum MeCl and VOC control efficiency of 96%. The adsorption system shall operate with a minimum acetone control efficiency of 94%. Medeva shall use, maintain and regenerate the carbon adsorption system consistent with the manufacturer's recommendations, and good engineering practice.

4) These limits will maintain VOC, single HAP, and multiple HAP emissions from this facility below the 6NYCRR Part 201 Major Stationary Source thresholds of 50, 10, and 25 tons per year, respectively. These limitations will also limit Medeva emissions below applicability thresholds of
6 NYCRR Part 233, and 40 CFR Part 63 Subpart GGG.

5) Production records will be maintained in a centralized location for the following emissions units:
00001: Two GPCG-60, GPCG-5, and existing coating towers/fluid bed dryers;
00002: GPCG-3 coating tower/fluid bed dryer and development fluid bed dryer;
00004: Methylphenidate process.

Production records will include the following parameters:

Coating Operations:

- number of batches run;
- batch loading rate (grams per batch);
- coating solution utilized (coating towers only);
- grams of solvent per gram of resin used per

batch.

Methylphenidate Process:

- number of batches run;
- batch loading rate (grams per batch);

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liters of Isopropyl Alcohol per batch (methylphenidate only).

6) A log will be maintained which records the monthly and annual amount of total VOCs and HAPs emitted from each of the above production processes, and the cumulative facility total. Annual emissions will be based on a rolling 12-month total.

7) Medeva shall utilize an analyzer/sampling system consisting of a total hydrocarbon flame ionization detector (FID) to monitor for hydrocarbon breakthrough at the outlet of the adsorption system. The FID shall be calibrated to measure parts per million (PPM) of methylene chloride. The analyzer/sampling system shall be designed to ensure that each carbon vessel is regenerated at intervals necessary to maintain the adsorption system's required control efficiency (96% for methylene chloride, and 94% for acetone).

8) All required records must be maintained on-site for a minimum period of 5 years.

9) These records must be made available to representatives of the Department upon request .

10) Department representatives must be granted access to the facility during normal business hours for the purpose of determining compliance with these conditions and any other state and federal air pollution control requirements, regulations or law.

11) On an annual basis, 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 this emissions cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with 6NYCRR Part 233 .

12) The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or compliance with 6NYCRR Parts 231, 233 and 40 CFR 63 Subpart GGG constitutes a violation of 6NYCRR Part 201

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and of the Act.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/25/2000 for the period 07/27/1999 through 07/26/2000

Condition 17: Required emissions tests

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 17.1:

An acceptable report of measured emissions shall be submitted, as may be required by the commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Condition 18: Visible emissions limited.

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 18.1:

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 19: Open Fires Prohibited at Industrial and Commercial Sites

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 19.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Condition 20: Recycling and Emissions Reduction

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 20.1:

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVAC's in Subpart B:



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- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.
- d. Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR Part 82.166. ("MVAC-like appliance as defined at 40 CFR Part 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR Part 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR Part 82.166.

****** Emission Unit Level ******

Condition 21: Compliance Demonstration

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 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.



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Permit ID: 8-2632-00048/00041

Facility DEC ID: 8263200048

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 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: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

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Permit ID: 8-2632-00048/00041

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Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00004

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 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: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00004

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:



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No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 27: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 227-1.3(a)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00005

Item 27.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date

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Facility DEC ID: 8263200048



Applicable Federal Requirement: 40CFR 60.48c(g), NSPS Subpart Dc

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00005

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Monitoring Frequency: DAILY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/25/2000 for the period 07/27/1999 through 07/26/2000

**Condition 26: Compliance Demonstration
Effective between the dates of 07/27/1999 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 60.48c(i), NSPS Subpart Dc

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00005

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2000.

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



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Condition 28: Compliance Demonstration

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00006

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than
0.050 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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 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: UPON REQUEST BY REGULATORY AGENCY

Condition 29: Compliance Demonstration

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00006

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 29.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 30: General Provisions

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 30.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 30.2:

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.

Item 30.3:

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.

Condition 31: Emission Unit Definition

Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 31.1:

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

Emission Unit: 0-00001

Emission Unit Description:

THIS UNIT CONSISTS OF TWO GPCG-60 COATING TOWER/FLUID BED DRYERS (S1001 AND S1002), EXISTING 20KG CAPACITY COATING TOWERS (S1003), AND AN EXEMPT R&D COATING TOWER(GPCG-5). CONTROL DEVICES INCLUDE AN OLD CARBON ADSORPTION SYSTEM , A HEPA FILTER (C1002), AND A VARA PC 18197 CARBON ADSORPTION UNIT (C1001) WHICH HAS REPLACED

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THE OLD CARBON SYSTEM. ASSOCIATED EMISSION POINTS INCLUDE 1000A AND 1000B WHICH SERVICE C1003, AND 1000C WHICH SERVICES C1002.

Building(s): NO. 3

Item 31.2:

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

Emission Unit: 0-00004

Emission Unit Description:

METHYPHENIDATE PRODUCTION PROCESS CONSISTING OF A FLUID BED DRYER AND A DISPENSING AND TRANSFER OPERATION. ASSOCIATED EMISSIONS POINTS INCLUDE 4000A AND 4000B. EMISSION SOURCES INCLUDE S4001, S4002, AND C4001.

Building(s): NO. 3

Item 31.3:

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

Emission Unit: 0-00005

Emission Unit Description:

THIS UNIT CONSISTS OF TWO 21 MMBTU/HR BOILERS WHICH USE STRICTLY NATURAL GAS. THE EMISSION POINTS CONNECTED TO THIS UNIT INCLUDE 5000A AND 5000B. EMISSION SOURCES INCLUDE S5001, AND S5002.

Building(s): NO. 3

Item 31.4:

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

Emission Unit: 0-00006

Emission Unit Description:

THIS UNIT CONSISTS OF A GRANULATION DRYING SYSTEM (ROOM NO. 1131) AND A FLUID BED DRYER (ROOM NO. 1131). THE ASSOCIATED EMISSION POINTS INCLUDE 00002 AND 00203. THE GRANULATION DRYING SYSTEM IS CONTROLLED BY A FABRIC COLLECTOR (C6001) AND THE FLUID BED D RYER IS CONTROLLED BY A HEPA FILTER (C6002). EMISSION SOURCES INCLUDE S6001, AND S6002.

Building(s): NO. 1

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Condition 32: Air pollution prohibited
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 32.1:

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 33: Diesel truck opacity limitation
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 217-3.2(a)

Item 33.1:

No person who owns, operates or leases a vehicle propelled by a diesel engine or who owns, leases or occupies land and has actual or apparent dominion or control over the operation of a vehicle propelled by a diesel engine which is present on said land, shall operate said vehicle or allow or permit it to be operated, in such a manner that exhaust emissions of a shade of blue, black, or gray equal to or greater than No. 1 on the Ringelmann chart (20 percent opacity) or equivalent standard acceptable to the commissioner are produced for a continuous period of more than five seconds when the vehicle is in motion.

Condition 34: Idling of diesel trucks limited
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 217-3.2(b)

Item 34.1:

No person who owns, operates or leases a bus or truck, the motive power for which is provided by a diesel engine or who owns, leases or occupies land and has the actual or apparent dominion or control over the operation of a bus or truck present on such land, the motive power for which said bus or truck is provided by a diesel engine, shall allow or permit the diesel engine of such bus or truck to idle for more than five consecutive minutes when the bus or truck is not in motion, except as otherwise permitted by 6 NYCRR Subpart 217-3.3.

****** Emission Unit Level ******

Condition 35: Emission Point Definition By Emission Unit
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5



Item 35.1:

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

Emission Unit:	0-00001		
Emission Point:	1000A		
Height (ft.):	12	Diameter (in.):	18
			Building: NO. 3
Emission Point:	1000B		
Height (ft.):	9	Diameter (in.):	16
			Building: NO. 3
Emission Point:	1000C		
Height (ft.):	36	Diameter (in.):	18

Item 35.2:

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

Emission Unit:	0-00004		
Emission Point:	4000A		
Height (ft.):	36	Diameter (in.):	12
			Building: NO. 3
Emission Point:	4000B		
Height (ft.):	29	Diameter (in.):	32
			Building: NO. 3

Item 35.3:

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

Emission Unit:	0-00005		
Emission Point:	5000A		
Height (ft.):	36	Diameter (in.):	24
			Building: NO. 3
Emission Point:	5000B		
Height (ft.):	36	Diameter (in.):	24
			Building: NO. 3

Item 35.4:

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

Emission Unit: 0-00006



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Emission Point: 00002
Height (ft.): 18 Length (in.): 32 Width (in.): 32
NYTMN (km.): 4773.721 NYTME (km.): 286.629 Building: NO. 1

Emission Point: 00203
Height (ft.): 28 Length (in.): 30 Width (in.): 22
NYTMN (km.): 4773.721 NYTME (km.): 286.629 Building: NO. 1

Condition 36: Process Definition By Emission Unit
Effective between the dates of 07/27/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 36.1:

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

Emission Unit: 0-00001

Process: 101

Process Description:

THIS PROCESS INVOLVES A RESIN COATING AND DRYING OPERATION. RESIN IS COATED WITH A SOLVENT SOLUTION IN ONE OR MORE COATING TOWERS. THE RESIN IS SUBSEQUENTLY DRIED THROUGH A FLUIDIZED BED MECHANISM. SOLVENT LADEN EXHAUST AIR IS CONVEYED THROUGH A HEPA FILTER AND A CARBON ADSORPTION SYSTEM IN SERIES.

Emission Source/Control: C1001 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: C1002 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: S1001 - Process

Emission Source/Control: S1002 - Process

Emission Source/Control: S1003 - Process

Item 36.2:

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

Emission Unit: 0-00001

Process: 102

Process Description:



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THIS PROCESS INVOLVES DRYING OF AN AQUEOUS RESIN SOLUTION. EXHAUST AIR WILL BE ROUTED THROUGH A HEPA FILTER WHICH DISCHARGES TO THE ATMOSPHERE. SOLVENT COATING WILL NOT TAKE PLACE AND THEREFORE EMISSIONS WILL NOT BE ROUTED THROUGH THE CARBON ADSORPTION UNIT.

Emission Source/Control: C1002 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: S1001 - Process

Emission Source/Control: S1002 - Process

Item 36.3:

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

Emission Unit: 0-00004

Process: 401

Process Description:

THIS PROCESS INVOLVES THE WEIGHING, MIXING, AND DRYING OF THE METHYLPHENIDATE PRODUCT.

Emission Source/Control: C4001 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: S4001 - Process

Emission Source/Control: S4002 - Process

Item 36.4:

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

Emission Unit: 0-00005

Process: 501

Process Description:

THIS PROCESS INVOLVES THE COMBUSTION OF NATURAL GAS IN TWO 21 MMBTU/HR BOILERS. THE BOILERS ARE CLEAVER-BROOKS MODEL NO. CBLE-700-500.

Emission Source/Control: S5001 - Process

Emission Source/Control: S5002 - Process

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Item 36.5:

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

Emission Unit: 0-00006

Process: 601

Process Description:

THIS PROCESS INVOLVES THE DRYING OF
MATERIAL THROUGH THE ENTRAINMENT OF HOT
AIR.

Emission Source/Control: C6001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: C6002 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: S6001 - Process

Emission Source/Control: S6002 - Process