



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 8-2632-00048/00041  
Effective Date: 02/20/2019 Expiration Date: 02/19/2029

Permit Issued To: UNITHER MANUFACTURING LLC  
755 JEFFERSON RD  
ROCHESTER, NY 14623

Contact: CHRISTIAN R HARGIS  
UNITHER MANUFACTURING LLC  
755 JEFFERSON RD  
ROCHESTER, NY 14623  
(585) 274-5428

Facility: UNITHER MANUFACTURING LLC  
755 JEFFERSON RD  
ROCHESTER, NY 14623

Description:  
Renewal, and addition of expiration date, of Air State Facility permit for Unither which is a pharmaceutical production and coating company.

The renewed permit includes continuation of conditions to restrict Potential to Emit (PTEs) for Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC) to below the Subpart 201-6 major source thresholds, the Part 233 VOC RACT thresholds, and the 40 CFR Part 63 Subpart GGG MACT standard thresholds.

The facility includes emission unit 000001 (coating and drying), emission unit 000004 (mixing and drying), emission unit 000005 (3 boiler systems), emission unit 000006 (drying).

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



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:           KIMBERLY A MERCHANT  
  6274 E 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 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 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: 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 8 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 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466

**New York State Department of Environmental Conservation**

Permit ID: 8-2632-00048/00041

Facility DEC ID: 8263200048



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

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY  
PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: UNITHER MANUFACTURING LLC  
755 JEFFERSON RD  
ROCHESTER, NY 14623

Facility: UNITHER MANUFACTURING LLC  
755 JEFFERSON RD  
ROCHESTER, NY 14623

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

Permit Effective Date: 02/20/2019

Permit Expiration Date: 02/19/2029



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 2 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 3 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*4 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*5 6 NYCRR 201-7.1: Capping Monitoring Condition
- 6 6 NYCRR 211.2: Visible Emissions Limited

#### Emission Unit Level

##### EU=0-00001

- 7 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 8 6 NYCRR 212-2.4 (b): Compliance Demonstration

##### EU=0-00001,Proc=101,ES=C1001

- 9 6 NYCRR 212-1.7 (b): Compliance Demonstration

##### EU=0-00004

- 10 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 11 6 NYCRR 212-2.4 (b): Compliance Demonstration

##### EU=0-00005

- 12 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 13 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
- 14 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Demonstration

##### EU=0-00006

- 15 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 16 6 NYCRR 212-2.4 (b): Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 17 ECL 19-0301: Contaminant List
- 18 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 19 6 NYCRR Subpart 201-5: Emission Unit Definition
- 20 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 21 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 22 6 NYCRR 211.1: Air pollution prohibited

#### Emission Unit Level

- 23 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 24 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

##### EU=0-00001,Proc=101

- 25 6 NYCRR 212-2.3 (b): Compliance Demonstration

##### EU=0-00001,Proc=101,ES=C1001

- 26 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**

**This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Sealing - 6 NYCRR 200.5**

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 labeling 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.

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.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

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.

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

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.

**Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2**

If an existing emission source was subject to the permitting requirements of 6 NYCRR 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.

**Item E: Recycling and Salvage - 6 NYCRR 201-1.7**

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.

**Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**

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.

**Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**

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.

**Item H: Proof of Eligibility for Sources Defined as Trivial**



**Activities - 6 NYCRR 201-3.3 (a)**

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.

**Item I: Required Emission Tests - 6 NYCRR 202-1.1**

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 6 NYCRR Subpart 202-1.

**Item J: Open Fires Prohibitions - 6 NYCRR 215.2**

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

**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.

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are federally enforceable.**

**Condition 1: Recycling and Emissions Reduction**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 1.1:**

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

**Condition 2: Recycling and Emissions Reduction**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 2.1:**

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:

- 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

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**Condition 3: Facility Permissible Emissions**  
Effective between the dates of 02/20/2019 and 02/19/2029

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 3.1:**

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

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

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

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

**Condition 4: Capping Monitoring Condition**  
Effective between the dates of 02/20/2019 and 02/19/2029

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 4.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1  
40 CFR 63.1250 (a)

**Item 4.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 4.3:**

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.

**Item 4.4:**

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.



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**Item 4.5:**

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 4.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to limit emissions below applicability thresholds for 6 NYCRR Part 201-6 (Major Stationary Source) and 40 CFR 63 (MACT) requirements, the annual emissions of HAPs from the facility shall not not exceed 9.9 tons per year for any individual HAP or 24.9 tpy for total HAPs, as determined on a rolling 12-month basis. To demonstrate compliance with these limits, emissions of individual HAPs and total HAPs from the facility shall be calculated on a monthly basis and incorporated into a rolling twelve-month total, expressed in tpy. Emission calculations shall be based on purchase records, material usage and production records, and/or engineering calculations. The records shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

Subsequent reports are due every 12 calendar month(s).

**Condition 5: Capping Monitoring Condition**

**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 5.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

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6 NYCRR 201-6.1

6 NYCRR 228-1.1

**Item 5.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 5.3:**

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.

**Item 5.4:**

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 5.5:**

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 5.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to limit emissions below applicability thresholds for 6 NYCRR Part 201-6 (Major Stationary Sources) and 6NYCRR Part 228-1 (Surface Coating Processes), the annual emissions of VOCs from the facility shall not exceed 49.9 tons per year (tpy), as determined on a rolling 12-month basis. To demonstrated compliance with this limit, emissions of VOCs from the facility shall be calculated on a monthly basis and incorporated into a rolling twelve-month total, expressed in tpy. Emission calculations shall be based on purchase records, material usage and production records, and/or engineering calculations. The records shall be retained on site for five years and made available to the Department upon



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request.

Monitoring Frequency: ANNUALLY  
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2020.  
Subsequent reports are due every 12 calendar month(s).

**Condition 6: Visible Emissions Limited**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 6.1:**

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.

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

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:6 NYCRR 212-1.6 (a)**

**Item 7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

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)



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Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**Item 8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):  
CAS No: 0NY075-00-5 PM-10

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from any new or modified process source for which an application was received by the Department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate, rated "B" or "C" that exceeds 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:6 NYCRR 212-1.7 (b)**

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 101 Emission Source: C1001

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





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Emission Unit: 0-00004

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

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: UPON REQUEST BY REGULATORY AGENCY

**Condition 11: Compliance Demonstration**

**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)**

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00004

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from any new or modified process source for which an application was received by the Department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate, rated "B" or "C" that exceeds 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf



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Reference Test Method: Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

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

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00005

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one-six-minute period per hour of not more than 27 percent opacity.

In addition, the Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is

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inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: EPA Method 9  
Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

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

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00005

**Item 13.2:**

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 (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2020.  
Subsequent reports are due every 12 calendar month(s).

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

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

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00005

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:



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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 7/30/2019.

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

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:6 NYCRR 212-1.6 (a)**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00006

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

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: UPON REQUEST BY REGULATORY AGENCY

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00006

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Regulated Contaminant(s):

CAS No: ONY075-00-5      PM-10

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from any new or modified process source for which an application was received by the Department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate, rated "B" or "C" that exceeds 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY





**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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 17: Contaminant List**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable State Requirement:ECL 19-0301**

**Item 17.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000067-63-0  
Name: ISOPROPYL ALCOHOL

CAS No: 000067-64-1  
Name: DIMETHYL KETONE

CAS No: 000075-09-2  
Name: DICHLOROMETHANE

CAS No: 0NY075-00-5



Name: PM-10

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 18: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable State Requirement: 6 NYCRR 201-1.4**

**Item 18.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the 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 19: Emission Unit Definition**



Effective between the dates of 02/20/2019 and 02/19/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

**Item 19.1:**

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

Emission Unit: 0-00001

Emission Unit Description:

This unit involves the production of pharmaceuticals with a resin coating and drying operation using coating towers and fluidized bed dryers

Building(s): No. 3

**Item 19.2:**

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

Emission Unit: 0-00004

Emission Unit Description:

This unit is composed of a Methyphenidate production process consisting of a fluid bed dryer and a dispensing and transfer operation.

Building(s): No. 3

**Item 19.3:**

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

Emission Unit: 0-00005

Emission Unit Description:

This unit consists of three (3) boiler systems. Building 1 natural gas boiler system consists of two (2) Cleaver-Brooks 350 hp/hr units that when both units are combined generate 29.3 MMbtu/hr. Building 2 natural gas boiler system consists of two (2) Cleaver-Brooks 200 hp/hr units that when both units are combined generate 16.74 MMbtu/hr. Building 3 natural gas boiler systems consists of two (2) Cleaver-Brooks 500 hp/hr units that when both units are combined generate 41.84 MMbtu/hr. Associated emission points include 5000A and 5000B. Emission sources include S5001, and S5002

Building(s): No. 1  
No. 2  
No. 3

**Item 19.4:**

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



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collector (C6001) and the fluid bed dryer is controlled by a HEPA filter (C6002).

Building(s): No. 1

**Condition 20: Renewal deadlines for state facility permits  
Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable State Requirement:6 NYCRR 201-5.2 (c)**

**Item 20.1:**

The owner or operator of a facility having an issued state facility 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.

**Condition 21: Compliance Demonstration  
Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable State Requirement:6 NYCRR 201-5.3 (c)**

**Item 21.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 8  
6274 East Avon-Lima Rd.  
Avon, NY 14414

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

Subsequent reports are due every 12 calendar month(s).

**Condition 22: Air pollution prohibited  
Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 22.1:**

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

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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.

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

**Condition 23: Emission Point Definition By Emission Unit**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 23.1:**

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  
NYTMN (km.): 4773.7 NYTME (km.): 286.6 Building: No. 3

Emission Point: 1000B

Height (ft.): 9 Diameter (in.): 16  
NYTMN (km.): 4773.7 NYTME (km.): 286.6 Building: No. 3

Emission Point: 1000C

Height (ft.): 36 Diameter (in.): 18  
NYTMN (km.): 4773.7 NYTME (km.): 286.6 Building: No. 3

**Item 23.2:**

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  
NYTMN (km.): 4773.7 NYTME (km.): 286.6 Building: No. 3

Emission Point: 4000B

Height (ft.): 29 Diameter (in.): 32  
NYTMN (km.): 4773.7 NYTME (km.): 286.6 Building: No. 3

**Item 23.3:**

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

Emission Unit: 0-00005

Emission Point: 5000A



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Emission Source/Control: S1003 - Process

**Item 24.2:**

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

Emission Unit: 0-00001

Process: 102

Source Classification Code: 3-01-060-09

Process Description:

This process involves drying of an aqueous resin solution. Exhaust air is routed through a HEPA filter which discharges to the atmosphere. Solvent coating does not take place and therefore emissions are not 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 24.3:**

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

Emission Unit: 0-00001

Process: 103

Source Classification Code: 3-01-060-11

Process Description:

This process involves drying of an aqueous resin solution. Resin is coated with a non-solvent solution in one or more coating towers. Exhaust air is routed through a HEPA filter

Emission Source/Control: S1001 - Process

Emission Source/Control: S1002 - Process

Emission Source/Control: S1003 - Process

**Item 24.4:**

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

Emission Unit: 0-00004

Process: 401

Source Classification Code: 3-01-060-11

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







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Process: 601 Source Classification Code: 3-01-060-12

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

**Condition 25: Compliance Demonstration**  
**Effective between the dates of 02/20/2019 and 02/19/2029**

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

**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001  
Process: 101

Regulated Contaminant(s):

CAS No: 000067-63-0	ISOPROPYL ALCOHOL
CAS No: 000067-64-1	DIMETHYL KETONE
CAS No: 000075-09-2	DICHLOROMETHANE

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility owner or operator shall not allow emissions of the air contaminant(s) listed above to exceed the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants. The above listed contaminants have been given an Environmental Rating of “B” for the associated process emission source. One or more of the listed contaminants have been demonstrated to have an emission rate potential (ERP) of greater than 10 pounds/hour and therefore the facility must maintain a control efficiency of at least 90% when this process is in operation. The facility must maintain records to demonstrate that none of the contaminants have had an increased ERP. Any increase in the ERP of a contaminant will require a reevaluation of its ambient impacts and environmental rating.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 26: Compliance Demonstration**  
Effective between the dates of 02/20/2019 and 02/19/2029

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

**Item 26.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 101

Emission Source: C1001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

CAS No: 000075-09-2 DICHLOROMETHANE

**Item 26.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Adsorber outlet exhaust must not exceed 372 parts per million hydrocarbons as measured with a flame ionization detector hydrocarbon analyzer. The data logger will capture data every 5 seconds. At 371 ppm the system will divert solvent laden air flow from one adsorber to another.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 372 parts per million (by volume)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

