

Synthetic Minor Determination and/or  Netting Determination

Permit To Install **08-04578**

**A. Source Description**

Eurand America, Inc., SIC 2834 is a manufacturing facility that processes pharmaceuticals. Eurand does not manufacture the pharmaceuticals at this site but enhances them. Some of Eurand's enhancements include adding taste-masking and a time extension coating to the drugs. This PTI application is for a Bead Preparation room (P013); this is a batch process which includes mixing/formulation, air drying and heated drying. Eurand will be employing the use of a catalytic oxidizer with 98% destruction efficiency to limit the facility-wide organic compound emissions below the Title V threshold of a 100 tons per year. The following sources contribute to Eurand's facility wide organic compound emissions:

ID	Description	PTI	Issued	Allowables		
				lb/hr	TPY	
P001	200, 500 and 1000 gal. Pharm. Microencapsulation systems and dryers	08-04386	8/27/02	3.20	14.00	Syn Min
P008	Glatt Fluid bed coater	08-04603		0.68	2.23	Syn Min
P012	Phar. Processing system	08-04386	8/27/02	5.00	16.80	Syn Min
P013	Pharm. Bead prep rm w/ enclosed granulator, 2 extruders, 2 spheronizers and 4 drying ovens	08-04578		0.15	0.47	Syn Min
P014	Pan coater for pharm.	08-04386	8/27/02	0.66	2.89	Syn Min
P015	Glatt Fluid Bed Coater	08-04386	8/27/02	0.68	2.99	Syn Min
P017	Glatt 120 Pharm. Spray coater	08-04386	8/27/02	5.56	19.50	Syn Min
P019	Gruenberg Tray Oven	08-04572		0.41	1.34	Syn Min
Total Synthetic Minor OC emissions:					60.22	
P018	Pharm. Drying Oven	08-04337	11/8/01	Natural	15.20	
B002	7.74 MMBTU/hr nat. gas fired boiler			T-status	0.37	
P007	Versi-Glatt (R&D only)			T-status	1.00	aqueous only; no solvent
TXX	10,000 gal. Solvent storage tk			de minimis	0.80	
X						
P005	Solvent Recovery System			T-status	0.80	
P006	Lab hoods (R&D)			T-status	1.00	PTI exempt
T005	Solvent storage Area (55 gal drums & smaller)			T-status	negligible	no open containers
Total					79.39	

**B. Facility Emissions and Attainment Status**

Eurand America, Inc. is located in Montgomery County which is currently in attainment for all criteria pollutants. Eurand has 15 emissions units, of which 8 are permitted as synthetic minors, 1 as a natural minor, 5 on registration status and 1 de minimis. The current facility-wide OC potential to emit (PTE) (permitted allowable) is 79.39 TPY OC from all emission units including those on registration status. Those emission units covered by synthetic minor permits to install contribute 60.22 TPY OC to the facility wide OC PTE.

**C. Source Emissions**

Uncontrolled potential to emit from P013 is 23.55 TPY OC. This permit will be issued in draft and will have federally enforceable rolling, 12-month limitations of 0.47 TPY OC. The short term and annual OC emission limitation is based on the potential to emit of this emissions unit with control. OC emissions will be controlled by a catalytic oxidizer with 98% overall OC removal efficiency. Parametric monitoring and daily record keeping of the catalytic oxidizer will also be federally enforceable.

**D. Conclusion**

A PTI is recommended for this emission unit. Federal enforceability of the synthetic minor emission limitation for P013 will be achieved through parametric monitoring of the control device through daily record keeping and rolling, 12-month limitations on OC emissions.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
MONTGOMERY COUNTY  
Application No: 08-04578**

**CERTIFIED MAIL**

**DATE: 5/20/2004**

Eurand America Inc  
Dane Marsee  
845 Center Dr  
Vandalia, OH 453770000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

RAPCA

KY

IN

**MONTGOMERY COUNTY**

**PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04578 FOR AN AIR CONTAMINANT SOURCE FOR  
EURAND AMERICA INC**

On 5/20/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Eurand America Inc**, located at **845 Center Dr, Vandalia**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04578:

**modification to increase batch size for the process from a theoretical yield of 456 to 760 kg, chapter 31 replacing 08-04112 issued 12-22-99.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280  
[(937)225-4435]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 08-04578**

Application Number: 08-04578  
APS Premise Number: 0857171794  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Eurand America Inc  
Person to Contact: Dane Marsee  
Address: 845 Center Dr  
Vandalia, OH 453770000

Location of proposed air contaminant source(s) [emissions unit(s)]:

**845 Center Dr  
Vandalia, Ohio**

Description of proposed emissions unit(s):

**modification to increase batch size for the process from a theoretical yield of 456 to 760 kg, chapter 31 replacing 08-04112 issued 12-22-99.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Eurand America Inc**

**Facility ID: 0857171794**

**PTI Application: 08-04578**

**Issued: To be entered upon final issuance**

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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**PTI Application: 08-04578**

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### **15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

### **B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	0.47

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - Bead Preparation and coating of pharmaceuticals (granulator, 2-extruders, 2-spheronizers and 4-drying ovens) with catalytic oxidizer  * <b>modification</b>	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 0.15 pound per hour (lb/hr).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B).
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V)	The organic compound (OC) emissions from this emissions unit shall not exceed 0.47 tons per year (TPY), as a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(G)(6)	See Sections A.2.a and c below for emission control measures.  The requirements specified by these rules are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The OC emissions from this emissions unit shall be controlled through the application of

**Eurand America Inc**  
**PTI A**  
**Issued**

**Facility ID: 0857171794**

Emissions Unit ID: **P013**

either the Megtec catalytic oxidizer system or the CSM catalytic oxidizer system, operating at a minimum of 98% overall OC removal/destruction efficiency. [The Megtec Catalytic oxidizer system is a common OC control device for emissions units P001, P008, P013, P014, P015, P017 and P019. The CSM catalytic oxidizer system is a common OC control device for emissions units P012 and P013.]

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- 2.b** The 0.15 lb/hr of OC emission limitation from the process was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.c** The total allowable emissions of organic compounds (OC) from emissions units P001 (200, 500 and 1,000 gallon pharmaceutical microencapsulation systems and dryers), P012 (pharmaceutical processing system), P014 (pan coater for pharmaceuticals), P015 (glatt fluid bed coater) and P017 (glatt 120 pharmaceutical spray coater) permitted in 08-04386; P013 (pharmaceutical bead preparation room with enclosed granulator 2 extruders, 2 spheronizers and 4 drying ovens) permitted in 08-04578; P019 (gruenberg tray oven) permitted on 08-04572; and P008 (glatt fluid bed coater) permitted on 08-04603 along with the following emissions units P018, permitted in 08-04337; B002, P007, P005, P006, T005, and other deminimis emissions units shall not exceed 79.39 TPY OC. Compliance with the above limitation shall be based on a rolling-12-month summation of the emissions.

**B. Operational Restrictions**

1. When emissions unit P013 is venting to the CSM catalytic oxidizer the following shall apply:
  - a. The average temperature of the exhaust gases immediately before the catalyst bed, for any 24-hour averaging period when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance test that demonstrated the emissions unit was in compliance was conducted on May 31, 2001 and June 11, 2001. The test results showed an average inlet temperature of 600 degrees Fahrenheit.]
  - b. The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
2. When emissions unit P013 is venting to the megtec catalytic oxidizer the following shall apply:
  - a. The average temperature of the exhaust gases immediately before the catalyst bed, for any 24-hour averaging period when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 24-hour averaging period when the emissions

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**PTI A**

Emissions Unit ID: **P013**

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unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

- b. The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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3. Emissions unit P013 shall be equipped with a permanent total enclosure (PTE)\* that shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
  - a. Any "Natural Draft Opening" (NDO)\* shall be at least 4 equivalent diameters from each VOC emission point.
  - b. The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling.
  - c. The average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure).
  - d. All access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation.
  - e. All VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

\* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

4. Emissions unit P013 has demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed a demonstration on June 11, 2001 to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). All doors remain closed during processing, exempt for emergency use. Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting

requirements to ensure the ongoing integrity of the PTE for this emissions unit.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record for each batch, which catalytic oxidizer system the emission unit is venting to.
2. When emissions unit P013 is venting to the CSM catalytic oxidizer, the permittee shall operate and maintain a temperature monitor and recorder which measures and records the temperature immediately upstream of the oxidizer's catalyst bed at least every 15 minutes during which the control device is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. All 24-hour averaging periods (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. When emissions unit P013 is venting to the Megtec catalytic oxidizer the permittee shall operate and maintain temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the oxidizer's catalyst bed at least every 15-minutes during which the control device is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. All 24-hour averaging period (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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- b. All 24-hour averaging period (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
  - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall collect and record the following information each month:
- a. The total number of batches\*.
  - b. The total number of sub-batches per batch.
  - c. The company identification for each organic solvent employed.
  - d. The number of gallons of each organic solvent employed in each batch.
  - e. The density of each organic solvent employed, in pounds per gallon.
  - f. The pounds of organic compound solvent material employed in each batch, i.e., (d) X (e).
  - g. The total uncontrolled OC emissions , in pounds per month (i.e., (a) x (f)).
  - h. The total controlled OC emissions, in pounds per month (i.e., (g) x (1-0.98)).
  - i. The rolling, 12-month summation of the monthly OC emissions.

\* For emissions units P013, product is measured in sub-batches. A batch is comprised of up to 190 sub-batches. Individual sub-batches are mixed, extruded, and spheronized before being placed into one of four drying ovens. The drying cycle for an oven does not begin until 38 sub-batches have filled that oven to capacity. The drying cycle for the ovens is staggered depending on when each oven is filled.

5. The permittee shall perform a preventive maintenance inspection of the CSM catalytic oxidizer on an annual basis to evaluate the performance of each catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventive maintenance checklist submitted to the Regional Air Pollution Control Agency on April 12, 2002, and shall include a physical inspection of each unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment

Emissions Unit ID: **P013**

shall be performed in accordance with the manufacturer's recommendations. Repair and replacement of equipment shall be performed as necessitated by the inspection. Samples of catalyst material shall be collected from the catalyst bed to perform the catalyst activity test described in Section E.2. of this permit.

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in Section E.2. of this permit.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.2. of the General Terms and Conditions of this permit, that shall include the following information:
  - a. For the CSM catalytic oxidizer system:
    - i. An identification of all 24-hour averaging period when the emissions unit was in operation and vented to the CSM catalytic oxidizer system during which the average combustion temperature within the catalytic oxidizer, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. For the Megtec catalytic oxidizer system:
    - i. An identification of all 24-hour averaging period when the emissions unit was in operation and vented to the Megtec catalytic oxidizer system during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
    - ii. An identification of all 24-hour averaging periods when the emissions unit was in operation and vented to the Megtec catalytic oxidizer system during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system(s), control device(s), and monitoring equipment(s), when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter.

Emissions Unit ID: **P013**

3. The permittee shall submit an annual report that includes the results of the annual catalyst activity test for the CSM catalytic oxidizer system required in Section E.2. of this permit. The report shall also include a proposed course of action for the catalyst. Proposed actions may include no action, catalyst re-testing, catalyst cleaning, or catalyst replacement, and shall be based on the catalyst activity test(s), manufacturer's recommendations, and engineering assessments. This annual report shall be submitted within 45 days after each catalyst activity test is performed.
4. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation -  
The organic compound (OC) emissions from this emissions unit shall not exceed 0.15 pound per hour (lb/hr).

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Applicable Compliance Method -

Compliance shall be demonstrated by the Engineering Study conducted between October 27, 2003 and January 16, 2004 which established emissions data based on a worst case batch process.

b. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 0.47 tons per year (TPY).

Applicable Compliance Method -

Compliance shall be determined by the record keeping as specified in Section C.4. of this permit and shall be the summation of the monthly controlled organic emissions added to the total emissions from the previous eleven months, divided by 2000 lbs/ton, to determine the rolling, 12-month summation.

2. The permittee shall conduct, or have conducted, an annual catalyst activity test on the CSM catalytic oxidizer system using the catalyst sample(s) collected during the annual preventive maintenance inspection described in section C.5. An intent to test notification shall not be required for the testing noted in this section. The procedure for the catalyst activity test shall be in accordance with the "CSM Catalyst Sampling and Catalyst Testing" protocol as submitted to the Regional Air Pollution Control Agency on April 12, 2002.
3. Emissions testing of the CSM catalytic oxidizer system associated with P013, completed on June 11, 2001, demonstrated compliance with the mass allowable emission rates specified in Section A.1 and the catalytic oxidizer destruction efficiency of at least 98 percent as specified in Section A.2.a of this permit. No further emissions testing is required by this PTI.
4. The permittee shall conduct, or have conducted, emissions testing on the Megtec catalytic oxidizer associated with P013 in accordance with the following requirements:
  - a. The emissions testing shall be conducted within ninety days after permit issuance.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rates and overall control efficiency of 98% for organic compounds.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 18 of 40 CFR Part 60, Appendix A, as well as Method 25 or 25 A of 40 CFR Part 60, Appendix A, as appropriate, and the test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for organic compounds. Alternative U.S. EPA approved test methods

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may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 of the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95")

- d. The test(s) shall be conducted while all emissions units (P001,P013, P014, P015, P017 and P019) controlled by this common control device are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The

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permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The requirements of this permit supercede the requirements of PTI 08-04386, issued August 27, 2002. This permit is being modified to increase the number of sub-batches per batch; therefore, increasing the allowable emission limitation. This modification represents an increase in emissions of 0.12 TPY OC.
3. The following terms and conditions are federally enforceable: Sections A.1 (only the requirements associated with OAC 3745-35-07(B)), A.2.a and c, B.1 thru4, C.1 thru5, D.1 thru 4, E.1.b., E.2, and E.4.