

RESPONSE TO COMMENTS

Baxter Healthcare Corporation
1900 Hwy. 201
Mountain Home, AR 72653
Baxter County
AFIN: 03-00002

On September 22, 2003, the draft permit for the above referenced facility was issued. During the comment period, the facility submitted two comments. The Department gives the following responses to these comments:

Comment 1: Sec. II: Introduction: Process Description, 2nd paragraph:
SN-58 has been removed from service, and SN-101 (Ethylene Oxide Absorber Tower) is not mentioned. Please revise the paragraph as follows:

“Baxter manufactures capillary flow dialyzers (CF Dialyzers) (SN-04, SN-07), needles (SN-45), and Syntra Dialyzers (SN-04 and SN-104). Most of the manufactured products are sterilized at the facility using ethylene oxide (EtO)(SN-11 through SN-15, SN-57, ~~SN-58~~, SN-74 through SN-83, ~~and~~ SN-94, and SN-101).”

Response 1: The above mentioned changes have been incorporated into the final permit.

Comment 2: Sec.IV: Emission Unit Information: Source Description for SN-11 through SN-15, SN-57, SN-74 through SN-83, SN-88, SN-94 and SN-101:

One page of the source description was left out of the draft permit. The page begins with, “exceeding the maximum glycol....” and ends with, “... and reported in accordance with General Provision 8 of this permit.” Please re-insert the missing page.

Response 2: The page was accidentally left out of the hard copy of the draft permit and will be included in the final permit.

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 544-AOP-R3

IS ISSUED TO:

**Baxter Healthcare Corporation
1900 N. Hwy. 201
Mountain Home, AR 72653
Baxter County
AFIN: 03-00002**

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

June 17, 1999

and

June 16, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Baxter Healthcare Corporation
AFIN: 03-00002
PERMIT NUMBER: 544-AOP-R3

FACILITY ADDRESS: 1900 N. Hwy. 201
Mountain Home, AR 72653

COUNTY: Baxter

CONTACT NAME: Ms. Carolyn Walker, Environmental Administrator
TELEPHONE NUMBER: (870) 424-5336

REVIEWING ENGINEER: Amanda Holloway

UTM North-South (X): 4023.75
UTM East-West (Y): 555

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SECTION II: INTRODUCTION

Summary of Permit Activity

Baxter Healthcare Corporation (Baxter), previously known as Travenol Laboratories, Inc., operates a facility in Mountain Home, AR, which manufactures items used in the healthcare field (SIC 3081, 3089, and 3841). This minor modification to the air permit will allow Baxter an alternative evacuation process for the EtO Sterilization Chambers. This alternative evacuation method will allow Baxter the option of using vacuum pumps or steam ejectors to evacuate the chambers during the initial evacuation and the after gassing portion of the EtO Sterilization cycle. This modification will not change any permitted emission limits.

Process Description

Baxter Healthcare Corporation (Baxter) operates a facility in Mountain Home, AR, which manufactures items used in the healthcare field (SIC 3081, 3089, and 3841).

Baxter manufactures capillary flow dialyzers (CF Dialyzers) (SN-04, SN-07), needles (SN-45), and Syntra Dialyzers (SN-04 and SN-104). Most of the manufactured products are sterilized at the facility using ethylene oxide (EtO) (SN-11 through SN-15, SN-57, SN-74 through SN-83, SN-94, and SN-101).

Ethylene Oxide Sterilization

The ethylene sterilization process involves the placement of manufactured, packaged health care items in a chamber. A partial vacuum is pulled on the chamber by using a steam jet injector (SN-11 through SN-15, and SN-57). When the evacuation process is completed, the chamber is filled with ethylene oxide. After a pre-determined time, a maximum of 95% of the ethylene oxide is pulled from the chamber by the vacuum pump and routed to the scrubber. The ethylene oxide is converted to ethylene glycol and stored in an 8,000 gallon storage tank (SN-88).

Capillary Flow Dialyzers

Baxter also manufactures capillary flow (CF) dialyzers. These dialyzers are used in artificial kidney machines. The CF unit is constructed of fibers purchased from an outside supplier which are wound, sized, and placed in a plastic case. The units are sent to an Orbital centrifuge (SN-04) where the fibers are sealed in place with urethane. Finally, the individual units are cut and sent to final assembly and packaging areas.

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Needles

The Needles process is used to produce and assemble needles for various blood collection products. The stainless steel cannula is taped and the tip is ground. Water used to cool the grinding wheel captures the majority of PM generated. A hood over the grinding process captures some PM which is emitted to the atmosphere through the fabric filter (SN-45).

Plastics

Raw materials are received in both bulk and packaged for manufacturing of plastic film and tubing. The first step is blending. After blending, the blend is then sent to the film extrusion area, pelletizing area, or exported to other locations for processing.

Syntra Dialyzers

A Syntra Dialyzer is the disposable device used in kidney dialysis machines. The unit consists of a bundle of hollow fibers which are sealed into a plastic casing. Fibers are placed into a plastic case which is capped in the Case/Bundle assembly area. Caps are attached with a snap-on fit. The units are then sent to a centrifuge potting (SN-104) system where the fibers are sealed in place with urethane. The individual units are cut and sent to final assembly and packaging areas.

Regulations

This facility is subject to the following regulations: Regulation 18 - *Arkansas Air Pollution Control Code*, Regulation 19 - *Regulations of the Arkansas Plan of Implementation for Air Pollution Control*, Regulation 26, *Regulations of the Arkansas Operating Air Permit Program*, and 40 CFR Part 63, Subpart O - *Ethylene Oxide Emission Standards for Sterilization Facilities* (See Appendix A).

Emission Summary

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY					
SN	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
01	Bundle Centrifuge &	Removed from Service			

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EMISSION SUMMARY					
SN	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
	Drum Cutter	Removed from Service			
02	Capco Assembly Area	Removed from Service (April 2002)			
03	Vacuum Dryers	Oil Mist	0.05	0.05	20
04	Orbital Centrifuge	VOC	1.0	0.8	20
		Methylene Chloride ¹	0	0	
		1,6-Hexamethylene diisocyanate (HMXDI) ²	0.08	0.1	
05	Orbital Centrifuge	Routed Through SN-04	N/A	N/A	N/A
06	Drum Cutter	Routed Through SN-01	N/A	N/A	N/A
07	Carbon Absorber C-1	VOC	2.0	2.0	23
		Freon 113	2.0	2.0	
08	Pellet Cooler Discharge	Removed From Service			
09	Filter Integrity Test Station Exhaust	VOC	6.9	0.1	26
10	Alcohol Storage Tanks	Removed From Service			
11-15	Sterilization Chamber Air Evacuation Exhaust	Ethylene Oxide ³	0.0 ⁴	0.0 ⁴	27
16	35 MMBTU/HR Lasker Boiler	PM	0.5	2.6	36
		PM ₁₀	0.5	2.6	
		SO ₂	17.6	13.2	
		VOC	0.1	0.5	
		CO	1.3	6.7	
		NO _x	5.0	24.8	

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SN	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
17	42 MMBTU/HR Babcock & Wilcox Boiler	PM	0.6	3.1	36
		PM ₁₀	0.6	3.1	
		SO ₂	21.1	15.6	
		VOC	0.1	0.5	
		CO	1.5	7.6	
		NO _x	6.0	29.5	
18	42 MMBTU/HR Boiler #3	Never Installed			
19	Degreasing Unit	Removed From Service			
20	Ultrasonic Degreaser Unit Freon TF	Removed From Service			
21	Ovens for Needles Covers	DEHP ⁵	0.1	0.44	41
		HCl ⁶	0.1	0.44	
22- 27	Ovens for Needles Covers	Routed through SN-21	N/A	N/A	N/A
28	Incinerator	Removed From Service			
29- 40	Extruders	Removed From Service			
41	Grinding Process	PM	2.5	11.0	42
		PM ₁₀	2.5	11.0	
42	Pelletizer	Removed From Service			
43	Procedyne Cleaner	Removed From Service			
44	Paint Booth	VOC	60	12.0	44
		HAPs ⁷	60	6.0	
45	Grinder #1	PM	0.1	0.5	46
		PM ₁₀	0.1	0.5	
		Chromium Compounds ⁹	0.017	0.018	
		Manganese Compounds ⁹	0.0017	0.0018	
46, 84	Marathon Filter Vapor Recovery System	Removed From Service			

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EMISSION SUMMARY					
SN	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
47	Bundle Centrifuge	Removed From Service			
48	Capco Assembly Area	Removed From Service			
49	Vacuum Dryer	Removed From Service			
50	Urethane Dispenser	Removed From Service			
51	Orbital Centrifuge	Removed From Service			
52	Drum Cutter	Removed From Service			
53	Phase V Freon System	Removed From Service			
54	Pre-Heat Tunnel	Removed From Service			
55	Alcohol Wash Centrifuge	Removed From Service			
56	Dry Heat Oven	Removed From Service			
57	Sterilization Chamber Air Evacuation Exhaust	Ethylene Oxide ³	0.0 ⁴	0.0 ⁴	27
58 ¹⁴	Ethylene Oxide Absorber Tower	Removed From Service			
59- 66	Resin Storage Silos	Insignificant Activity			68
67- 69	Water Chillers	Insignificant Activity			68
70, 71	N/A	Rescinded			
72	Jet Cleaner	DEHP ⁵	0.03	0.1	48
73	Grinder #2	Never Installed			
74, 75	Aeration Rooms 1 & 2	Removed from service			
76, 77 ¹⁴	Aeration Rooms 3 & 4	VOC Ethylene Oxide ³	0.0 ⁸ 0.0 ⁸	0.0 ⁸ 0.0 ⁸	27
78 ¹⁴	150 lb Sterilization	Ethylene Oxide ³	0.0 ⁸	0.0 ⁸	27

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EMISSION SUMMARY					
SN	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
	Chamber Rear Exhaust				
79 ¹⁴	150 lb Sterilization Chamber Rear Exhaust	Ethylene Oxide ³	0.0 ⁸	0.0 ⁸	27
80 ¹⁴	150 lb Sterilization Chamber Rear Exhaust	Ethylene Oxide ³	0.0 ⁸	0.0 ⁸	27
81 ¹⁴	150 lb Sterilization Chamber Rear Exhaust	Ethylene Oxide ³	0.0 ⁸	0.0 ⁸	27
82 ¹⁴	200 lb Sterilization Chamber Rear Exhaust	Ethylene Oxide ³	0.0 ⁸	0.0 ⁸	27
83 ¹⁴	200 lb Sterilization Chamber Rear Exhaust	Ethylene Oxide ³	0.0 ⁸	0.0 ⁸	27
85	Print Shop	VOC Methylene Chloride ¹	2.0 0.3	0.2 0.02	49
86	Chlorine Shed	Removed from Service (May 2000)			
87	Isolex 300 Sets	Insignificant Activity			
88	Ethylene Glycol Tanks	VOC Ethylene Glycol ³	1.0 1.0	0.1 0.05	27
89	DEHP Storage Tank	VOC DEHP ⁵	0.5 0.5	0.1 0.1	51
90	DEHP Storage Tank	VOC DEHP ⁵	0.5 0.5	0.1 0.1	51
91	Pallet Treatment Kiln Chamber	Never Installed			
92	Diapex Dialyzer Hot	Never Installed			

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EMISSION SUMMARY					
SN	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
	Wire Cutting				
93, 99	Pallet Treatment Oven	VOC	2.5	0.8	52
94	Sterilization Catalytic Oxidizer	PM	0.1	0.2	27
		PM ₁₀	0.1	0.2	
		SO ₂	0.1	0.1	
		VOC	0.2 ¹⁴	0.5 ¹⁴	
		CO	0.1	0.5	
		NO _x	0.5	2	
		Ethylene Oxide	0.15 ¹⁴	0.33 ¹⁴	
95	Plastics Manufacturing	VOC	2.0	8.9	54
		DEHP ⁵	1.21	4.57	
96	Molding Process	Insignificant Activity			68
97	Plantwide VOC Fugitive Emissions	VOC	230.0	148.5	57
		Methyl Ethyl Ketone ¹⁰	5.0	2.5	
98	Needles Blasting	Insignificant Activity			68
100	Fuel #2 Storage Tank	VOC	6.0	0.1	36
101	Ethylene Oxide Absorber Tower	VOC	1.1 ¹⁴	1.3 ¹⁴	27
		Ethylene Oxide	1.1 ¹⁴	1.3 ¹⁴	
102	Methylene Chloride Etching	Methylene Chloride	0.37	1.63	60
103	E-Beam Ionizing Radiation	Insignificant Activity			68
104	Syntra Dialyzer	VOC	0.1	0.1	62
105	Vacuum Dryers Oil Mist Stack	Oil Mist	0.05	0.05	20
106	Laser Sealing of Syntra Dialyzer	Insignificant Activity			68

EMISSION SUMMARY					
SN	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
Total Allowable Emissions		PM	3.8	17.4	
		PM ₁₀	3.8	17.4	
		SO ₂	38.8	28.9	
		VOC	315 ¹⁴	176.4 ¹⁴	
		CO	2.9	14.8	
		NO _x	11.5	56.3	
		Oil Mist	0.1	0.1	
		Freon 113	2.0	2.0	
		Methylene Chloride ¹	0.67	1.65	
		HCl ⁶	0.10	0.44	
		Chlorine ¹¹	0	0	
		HMXDI ²	0.08	0.10	
		Ethylene Oxide ³	1.25 ¹⁴	1.63 ¹⁴	
		DEHP ⁵	2.34	5.31	
		Chromium Compounds ⁹	0.02	0.02	
	Manganese Compounds ⁹	0.01	0.01		
	Ethylene Glycol ³	1.00	0.05		
	Methyl Ethyl Ketone ¹⁰	5.00	2.50		
	HAPs ⁷	60	6.00		

- ¹ - Methylene Chloride is a listed HAP. It is a listed non-VOC hydrocarbon.
- ² - HMXDI is a listed HAP. Emission rate of HMXDI is included in that of VOC.
- ³ - Ethylene Oxide and Ethylene Glycol are listed HAPs. Emission rates of both hydrocarbons are included in that of VOC.
- ⁴ - Ethylene Oxide may be emitted only as a result of emergency or upset conditions.
- ⁵ - DEHP is a listed HAP. Emission rate of DEHP is included in that of VOC.
- ⁶ - HCl is a listed HAP.
- ⁷ - Only HAPs with relative toxicity 1.0 are permitted at this source.
- ⁸ - Ethylene Oxide shall be emitted only as a result of emergency or upset conditions (Specific Conditions 25 and 43).
- ⁹ - Chromium and Manganese Compounds are listed HAPs. Emission rates of the compounds are included in that of PM/PM₁₀.
- ¹⁰ - Methyl Ethyl Ketone is a listed HAP. Emission rate of the hydrocarbon is included in that of VOC.
- ¹¹ - Chlorine is a listed HAP.

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- ¹² - Note no longer applies.
- ¹³ - Two aeration rooms will be in service until December 6, 1999. Effective December 6, 1999, aeration room #3 (SN-74, SN-75) will be cascaded into aeration room #4 (SN-76 and SN-77), which will be controlled by catalytic oxidizer.
- ¹⁴ - Emission rates are effective starting December 6, 1999.

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SECTION III: PERMIT HISTORY

Travenol Laboratories, Inc. was issued its first air permit, Permit #**530-A**, in 1978. Travenol was permitted to install two grinders (SN-41) and three boilers (SN-16, SN-17, and SN-18). The boilers were permitted to use fuel oil #2 as a secondary fuel. Natural gas was used as a primary fuel.

In 1978, Travenol Laboratories was permitted to construct three sterilization chambers (Permit #**544-A**). Ethylene oxide was permitted to be used as a sterilization agent (SN-11, SN-12, and SN-13).

In 1979, the permit #**544-A** was modified. A degreasing unit (SN-19) was permitted to be installed.

In 1980, Permit #**530-A** was modified. Fuel oil #5 was permitted to be burned in the boilers as a backup fuel.

In 1982, Permit #**544-A** was modified again. Travenol Laboratories had proposed to begin manufacturing the CF Dialyzers (SN-07).

In 1986, first consolidated Permit #**544-AR-3** was issued for the facility. All previous permits were voided. Many existing sources previously not permitted were included in the permit. A total of 45 sources were included in the consolidated permit. The second function of the permit was to allow Travenol Laboratories, Inc. to install and operate a ten-place ethylene oxide (EtO) sterilizer. By that time, four chambers were operated at the facility and one more chamber was permitted (SN-11 through SN-15).

In 1988, the facility's name was changed to Baxter Healthcare Corporation (Baxter). Permit #**544-AR-4** allowed the facility to install equipment to manufacture Marathon Filters (SN-46). The facility was required to test Freon 113 emissions from SN-46 and install, calibrate, and maintain a device to continuously monitor the hydrocarbons emissions from SN-46.

In 1988 (Permit #**544-AR-5**), Baxter was permitted to install a second Capillary Flow (CF) Dialyzer manufacturing line (SN-47 through SN-56). The permittee was required to measure the Freon TF emissions from the phase V Freon system (SN-53).

In 1990 (Permit #**544-AR-6**), Baxter was allowed to construct a scrubber (SN-58) as a part of the ethylene oxide sterilization system. The facility was required to route ethylene oxide from sterilization chambers to the scrubber. The following sources had been removed from service:

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Boiler #3 (SN-18), Degreasing unit (SN-19), Ultrasonic Degreaser (SN-20), and Incinerator (SN-28). Some other minor changes were included in the permit.

In 1994 (Permit #**544-AR-7**), Baxter was allowed to install a high intensity plastics blend system (SN-59 through SN-66). The following sources had been removed from service: SN-08, SN-10, SN-29, SN-42, SN-43, SN-45, SN-47, SN-48, SN-52, SN-53, SN-55, SN-56. The permit also included some other minor changes. All processes at the facility were permitted to be operated 24 hours per day, 7 days per week, and 52 weeks per year (8760 hours per year) unless otherwise specified.

In 1995, Baxter was issued a minor permit modification (Permit #**544-AR-8**). The facility was allowed to upgrade the pressure relief protection of the chillers in the boiler room complex to comply with ASHRAE Standard 15 (SN-67, SN-68, and SN-69). Other changes in the minor permit modification included the removal from service SN-49, SN-50, SN-51, and SN-54. The facility was identified as subject to requirements of Ethylene Oxide Emissions Standards for Sterilization Facilities (40 CFR Part 63, Subpart O). The facility was also identified as subject to requirements of the Title V air permitting (40 CFR Part 70).

In 1996, Baxter was issued a minor permit modification (Permit #**544-AR-9**) to add Pallet Treatment Process (SN-91).

In 1999, Permit # **544-AOP-R0** was the first Title V permit for the facility. The following changes, new sources and sources previously not permitted were included in that permit:

- SN-01 was removed from service;
- A new boiler, SN-18, was installed;
- The Needles Process (SN-45) that was not previously permitted;
- SN-73, a second needles grinder;
- Aeration rooms (SN-74 through SN-77) that were not previously permitted;
- Sterilization chamber rear exhausts (SN-78 through SN-83) that were not previously permitted;
- Marathon Filters (SN-46 and SN-84) were removed from service as of July, 1997;
- Two Bis(2-ethylhexyl)phthalate (DEHP) storage tanks (SN-89, SN-90) that were not previously permitted;
- The DiaPES Dialyzer to be manufactured at the facility (SN-92);
- A pallet treatment oven (kiln) (SN-92);
- The pallet treatment ovens (SN-93 and SN-99) that were not previously permitted;
- The catalytic oxidizer (SN-94) constructed in order to comply with 40 CFR Part 63, Subpart O;
- The fugitive emissions (SN-95 through SN-97);

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Fuel oil tank (SN-100) that was not previously permitted; and
The addition of a acid-water scrubber (SN-101).

In 2002, Permit # **544-AOP-R1** was issued. This permit was a minor modification that included the following changes:

- Production rate of dialyzers increased to a maximum of 5.5 MM units per year;
- The throughput of Dynasolve CU-6 increased to 2000 lb/yr;
- Specific Condition #126 was changed to require monthly preventive maintenance of SN-45;
- All references to SN-86, chloride shed, were removed;
- Specific Condition #163 was changed to increase the throughput of Methyl Ethyl Ketone (MEK);
- Emissions of MEK were increased to 2.5 tons per year for SN-97;
- Added SN-102, Methylene chloride etching;
- New source, SN-104, for the production of Syntra dialyzers was added;
- SN-18, SN-73, SN-91, and SN-92 were removed from the permit;
- SN-103, E-Beam Ionizing Radiation was added as an insignificant activity; and
- All conditions and emissions rates that were superseded by MACT Subpart O on December 6, 1999 were removed.

Permit # **544-AOP-R2** was a modification issued on November 26, 2002. The modification encompassed the following changes:

- Addition of an oil mist separator to SN-03, Vacuum Dryers, in order to minimize the oil mist emitted from the vacuum dryers;
- Installation of SN-105, Vacuum Dryers Oil Mist Stack, in order to operate the oil mist separator at its optimum level;
- SN-04, Orbital Centrifuge, production rate of dialyzers increased from 5.5 MM units per year to a maximum of 6.0 MM units per year;
- The facility discontinued use of methylene chloride to clean parts (Alternative Scenario #1) as of January 1999; therefore, conditions and emission rates associated with Alternative Scenario #1 (use of methylene chloride) were removed from the permit;
- SN-04, Alternate Scenario #3 included in the permit to allow the facility to use Dynasolve 180 (VOC emission);
- The VOC emissions from SN-04 increased to 1.0 lb/hr and 0.8 tpy;
- SN-106, Laser Sealing of Syntra Dialyzer, added to the list of Insignificant Activities under Group A.13;
- SN-58, Ethylene Oxide Absorber Tower, removed from service December 1999; therefore, related emissions were removed from the permit; and
- The section of the permit containing sources related to the sterilization process (11-15, 57, 76-83, 88, 94, 101) was updated to match the current operations at the facility, thus removing

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Alternative Operating Scenario #1 and related conditions.

Changes and total emission limits associated with the permits mentioned above are provided in the following table.

Permit # (Year)	Facility Wide (TPY)		
	Pollutant	Net Change	Permitted
530-A (1978)	PM/PM ₁₀		6.13
544-A (1978)	Ethylene Oxide (VOC, HAP)		147.8
544-A (Modification) (1979)	Freon 113		32.85
544-AR-3 (1986)	TSP	27.29	33.42
	SO ₂	---	1.8
	VOC	-51.85	95.95
	Freon 113	121.75	154.6
	Methylene Chloride (HAP)	---	2.37
	Hydrochloric Acid (HAP)	---	0.81
	Hexamethylene Diisocyanate (VOC, HAP)	---	0.15
	Ethylene Oxide (VOC, HAP)	-92.6	55.2
544-AR-4 (1988)	TSP	0	33.42
	SO ₂	0	1.8
	VOC	0	95.95
	Freon 113	10.526	165.13
	Methylene Chloride (HAP)	0	2.37
	Hydrochloric Acid (HAP)	0	0.81
	Hexamethylene Diisocyanate (VOC, HAP)	0	0.15
	Ethylene Oxide (VOC, HAP)	0	55.2
544-AR-5 (1988)	TSP	0	33.42
	SO ₂	0	1.8
	VOC	28.18	124.13
	Freon 113	65.70	230.83
	Methylene Chloride (HAP)	4.73	7.10
	Hydrochloric Acid (HAP)	0	0.81
	Hexamethylene Diisocyanate (VOC, HAP)	0.15	0.30
	Ethylene Oxide (VOC, HAP)	0	55.2

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Permit # (Year)	Facility Wide (TPY)		
	Pollutant	Net Change	Permitted
544-AR-6 (1990)	PM/PM ₁₀	-4.09	29.33
	SO ₂	175.98	177.78
	VOC	-35.56	88.57
	CO	---	11.33
	NO _x	---	124.56
	Freon 113	-100.82	130.01
	Methylene Chloride (HAP)	-0.1	7.0
	Hydrochloric Acid (HAP)	0	0.81
	Hexamethylene Diisocyanate (VOC, HAP)	-0.008	0.292
	Ethylene Oxide (VOC, HAP)	-36.98	18.22
544-AR-7 (1994)	PM/PM ₁₀	0.27	29.6
	SO ₂	0	177.8
	VOC	-26.57	62
	CO	0	11.4
	NO _x	0	124.5
	Freon 113	-63.41	66.6
	Methylene Chloride (HAP)	0.1	7.1
	Hydrochloric Acid (HAP)	-0.81	0
	Hexamethylene Diisocyanate (VOC, HAP)	0.208	0.5
	Ethylene Oxide (VOC, HAP)	0	18.2
	Cyclohexanone	0.1	0.1
	Myristate Oil	0.1	0.1
544-AR-8 (1995)	PM/PM ₁₀	2.9	32.2
	SO ₂	0.2	178.0
	VOC	-14.5	47.5
	CO	0	11.4
	NO _x	0.4	124.9
	Freon 113	0	66.6
	Freon 11	0.4	0.4
	HCFC 123	0.4	0.4
	Methylene Chloride (HAP)	-4.5	2.6
	Hexamethylene Diisocyanate (VOC, HAP)	-0.1	0.4
	Ethylene Oxide (VOC, HAP)	-15.3	2.9
	Cyclohexanone	0.3	0.4
	Myristate Oil	0.3	0.4

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Permit # (Year)	Facility Wide (TPY)		
	Pollutant	Net Change	Permitted
544-AR-9 (1996)	PM/PM ₁₀	0.1	32.3
	SO ₂	0.1	178.1
	VOC	0.1	47.6
	CO	0.1	11.5
	NO _x	0.1	125.0
	Freon 113	0	66.6
	Freon 11	0	0.4
	HCFC 123	0	0.4
	Methylene Chloride (HAP)	0	2.6
	Hexamethylene Diisocyanate (VOC, HAP)	0	0.4
	Ethylene Oxide (VOC, HAP)	0	2.9
	Cyclohexanone	0	0.4
	Myristate Oil	0	0.4
544-AOP-R0 (1999)	PM/PM ₁₀	-10.9	21.4
	SO ₂	-133.2	44.9
	VOC	133.6	181.2
	CO	11.0	22.5
	NO _x	-41.1	83.9
	Freon 113	-64.6	2.0
	Freon 11	-0.4	0.0
	HCFC 123	-0.4	0.0
	Methylene Chloride (HAP)	-2.48	0.12
	HCl (HAP)	0.44	0.44
	Chlorine (HAP)	0.05	0.05
	Hexamethylene Diisocyanate (VOC, HAP)	0.0	0.4
	Ethylene Oxide (VOC, HAP)	-0.91	1.99
	DEHP (VOC, HAP)	5.51	5.51
	Chromium Compounds (PM/PM ₁₀ , HAP)	0.036	0.036
	Manganese Compounds (PM/PM ₁₀ , HAP)	0.0036	0.0036
Ethylene Glycol (VOC, HAP)	0.066	0.066	
Methyl Ethyl Ketone (VOC, HAP)	2.0	2.0	
544-AOP-R1 (2002)	PM/PM ₁₀	-4.2	17.4
	SO ₂	-16.1	28.9
	VOC	-2.0	181.4
	CO	-8.2	14.8
	NO _x	-29.6	56.3
	Methylene Chloride	1.63	1.75

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Permit # (Year)	Facility Wide (TPY)		
	Pollutant	Net Change	Permitted
	Freon 113	0.0	2.0
	HCl (HAP)	0.0	0.44
	Chlorine (HAP)	-0.05	0
	Hexamethylene Diisocyanate (VOC, HAP)	0.0	0.1
	Ethylene Oxide (VOC, HAP)	0.0	1.63
	DEHP (VOC, HAP)	0.0	5.21
	Chromium Compounds (PM/PM ₁₀ , HAP)	-0.018	0.018
	Manganese Compounds (PM/PM ₁₀ , HAP)	-0.0018	0.0018
	Ethylene Glycol (VOC, HAP)	0.0	0.066
	Methyl Ethyl Ketone (VOC, HAP)	0.5	2.5
544-AOP-R2 (2002)	PM/PM ₁₀	0	17.4
	SO ₂	0	28.9
	VOC	-5.0	176.4
	CO	0	14.8
	NO _x	0	56.3
	Oil Mist	0.1	0.1
	Freon 113	0	2.0
	Methylene Chloride	-0.1	1.65
	HCl (HAP)	0	0.44
	Hexamethylene Diisocyanate (VOC, HAP)	0	0.1
	Ethylene Oxide (VOC, HAP)	0	1.63
	DEHP (VOC, HAP)	0.1	5.31
	Chromium Compounds (PM/PM ₁₀ , HAP)	0	0.018
	Manganese Compounds (PM/PM ₁₀ , HAP)	0	0.0018
	Ethylene Glycol (VOC, HAP)	-0.016	0.05
	Methyl Ethyl Ketone (VOC, HAP)	0	2.5

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SECTION IV: EMISSION UNIT INFORMATION

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SN-03: Vacuum Dryers
SN-04: Combined CF Dialyzer Process Vent
SN-105: Vacuum Dryers Oil Mist Stack

Source Description

The capillary flow (CF) Dialyzers, plastic disposable devices used in kidney dialysis machines, are assembled at this unit. The dialyzer consists of a bundle of hollow fibers which is sealed into a plastic casing. The fibers are purchased from an outside supplier. Fibers are placed into a plastic case which is capped in the Case/bundle assembly area. Caps are attached by friction fit. The units are then vacuum-dried to remove moisture (SN-03). A petroleum oil base is currently used in the vacuum pumps for lubrication. The exhaust from the vacuum dryers emits an oil mist along with warm moist air. The oil is separated by the oil mist separator and exhausts through the oil mist stack (SN-105).

The bundles are then sent to the Orbital centrifuge (SN-04) where the fibers are sealed in place with urethane. The urethane is made by mixing the prepolymer with blended catalyst (chain extender), then mixture is injected into the filters. Liquids come in sealed drums, and VOC emissions during drum handling are considered insignificant and identified in the Section VI: Insignificant Activities. One of the pre-polymers used to make urethane contains 5% 1,6-Hexamethylene diisocyanate (HMXDI), a listed HAP (CAS No. 822-06-0). A great majority of the HMXDI is incorporated into the product. Finally, the individual units are cut and sent to final assembly and packaging areas. Dry cutter emits inside the building.

Alternative Scenario #1 **(Discontinued in January of 1999)**

Methylene chloride (HAP, CAS NO. 74-87-3) is used to clean machine parts used in the potting equipment cleaning process. Methylene chloride comes in sealed drums. Used methylene chloride is collected in tightly closed containers. Emissions from potting equipment cleaning process are routed to SN-04.

Alternative Scenario #2

Dynasolve CU-6 (mixture of cyclic amide; butyrolacton; ethanol, 2-phenoxy-; tripropylene glycol monomethyl ether; propanoic acid, 3-ethoxy, ethyl ester; ethoxylated nonylphenol) is used to clean machine parts used in the potting equipment cleaning process. Dynasolve CU-6 comes in sealed containers. Used Dynasolve CU-6 is collected in tightly closed containers. Emissions from potting equipment cleaning process are routed to SN-04.

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Alternative Scenario #3

Dynasolve 180 (cyclic amide, CAS 872-50-4) is used to clean machine parts used in the potting equipment cleaning process. Dynasolve 180 comes in sealed containers. Used Dynasolve 180 is collected in tightly closed containers. Emissions from the potting equipment cleaning process are routed to SN-04.

The process and the equipment were installed in 1982.

Current modification removes SN-02 citations from the permit. SN-02 was removed from service in April 2002.

Specific Conditions

1. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this specific condition shall be demonstrated through compliance with Specific Conditions 3 and 4.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
04	VOC	1.0	0.8

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Conditions 3 and 4.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
03	Oil Mist	0.05	0.05
04	1,6-Hexamethylene diisocyanate (HMXDI)	0.08	0.1
105	Oil Mist	0.05	0.05

3. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not

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exceed a total Dynasolve CU-6 throughput of 2000 pounds for any consecutive twelve (12) month period for potting equipment cleaning (SN-04), while the source is operating under Alternative Scenario #2.

4. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total Dynasolve 180 throughput of 4000 pounds for any consecutive twelve (12) month period for potting equipment cleaning (SN-04), while the source is operating under Alternative Scenario #3.
5. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Conditions 3 and 4 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
6. Pursuant to §18.1003 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall conduct preventive maintenance of the oil mist separator (SN-03 and SN-105) every 6 months. The preventive maintenance shall include the filters to be changed every 6 months.
7. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with Specific Condition 6 and may be used by the Department for enforcement purposes. The records shall be updated every three months, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-07: CF Dialyzer Repair Station

Source Description

Alternative Scenario #1

The CF Dialyzers repair station uses Freon 113 (1,1,1-trichloro-2,2,2-trifluoroethane, CFC-113) to detect leaking filter fibers. Freon 113 has been found to have negligible photochemical reactivity and is not considered VOC. Freon 113 is a Class I, Group I ozone depleting chemical. The process and the equipment were installed in 1982.

The emissions of Freon 113 from the repair station are controlled by a series of two carbon absorbers. The absorbers are operated at ambient temperature and regenerated with steam as needed. The digital readout alerts the operator that the carbon absorber should be stripped. The readout shows any presence of Freon in the exhaust air and is checked once a month. The activated carbon is replaced as needed. The condensed Freon-steam mixture passes through a water separator and a Freon recovery still to recover Freon by distillation. Reclaimed Freon is routed back to the repair station. The bottoms from the still, consisting of waste Freon and water, are sent to a disposal or reclaiming company.

Alternative Scenario #2

The CF Dialyzers repair station uses HFE-7100 (mixture of methyl nonafluorobutylether and methyl nonafluoroisobutylether) to detect leaking filter fibers. HFE-7100 is VOC, but not an ozone depleting chemical. The emissions of HFE-7100 are exhausted directly to the atmosphere through SN-07.

Specific Conditions

8. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Conditions 10 and 12.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-07	VOC	2.0	2.0

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9. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the ozone depleting chemical emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Conditions 10 and 12.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-07	Freon 113	2.0	2.0

10. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 82, Subpart F, the permittee shall not exceed Freon 113 consumption 4,000 pounds for any consecutive twelve (12) month period for the CF dialyzers repair station (SN-07), while the source is operating under Alternative Scenario #1.
11. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 82, Subpart F, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 10, while the source is operating under Alternative Scenario #1, and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
12. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed HFE-7100 consumption 4,000 pounds for any consecutive twelve (12) month period for the CF dialyzers repair station (SN-07), while the source is operating under Alternative Scenario #2.
13. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 12, while the source is operating under Alternative Scenario #2, and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with

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Plantwide Condition 7 and General Provision 7.

14. Pursuant to §18.1003 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall replace activated carbon in both carbon absorbers (C-1 and C-2) as needed, while the source is operating under Alternative Scenario #1.
15. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with Specific Condition 14, while the source is operating under Alternative Scenario #1, and may be used by the Department for enforcement purposes. The records shall be updated annually, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-09: Filter Integrity Test

Source Description

Integrity testing. Filters are filled with or submerged into 99% isopropyl alcohol (IPA). After the alcohol is drained off, air is introduced to the filter to determine the bubble point. The filters are then dried by continuous air flow until all IPA is dispersed. The used IPA is collected and recycled. The testing is conducted several times per year, as necessary.

Cleaning of small parts and fittings. The parts are placed in a container and submerged into 99% isopropyl alcohol (IPA). Then they are removed and dried. The used alcohol is collected and recycled.

Isopropyl alcohol is received and collected in sealed containers. VOC emissions are vented to the atmosphere through normal powered room exhaust.

Specific Conditions

16. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 17.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
09	VOC	6.9 *	0.1

*Reflects maximum possible emission rate.

17. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall maintain records of the isopropyl alcohol (IPA) usage, IPA waste collected, and IPA emissions (IPA usage minus IPA waste collected) which demonstrate compliance with the limit listed in Specific Condition 16 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

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SN-11 through 15, 57
Sterilization Chamber Air Evacuation Vent

SN-76 and 77
Aeration Rooms #3 and #4

SN-78 through 83
Sterilization Chamber Rear Exhaust Vents

SN-88
Ethylene Glycol Tanks

SN-94
EtO Catalytic Oxidizer

SN-101
EtO Sterilization Scrubber

Source Description

The currently used equipment was installed in 1990-1996. The aeration rooms #1, #2, and #3 have been used since 1985, 1987, and 1993, respectively. Effective December 6, 1999, aeration rooms #1 and #2 were combined and re-designated as aeration room #4.

There are six (6) ethylene oxide (EtO) gas sterilization chambers at the facility; there are two 1330 ft³ (200 lb) and four 667 ft³ (150 lb) chambers. After chambers are loaded with packaged items, the air from the chambers is pulled out by the vacuum pumps (SN-101) or the steam jet ejectors (SN-11 through SN-15, and SN-57). Then, the chambers are filled with ethylene oxide. Negative gauge pressure is kept within the chambers during sterilization process. At the end of sterilization cycle, ethylene oxide is pulled out by vacuum pumps and routed to the scrubber. In the scrubber, >99% of EtO is absorbed from the exhaust gas by water. The sterilization chambers vent as SN-101.

After ethylene oxide is evacuated from the chamber, the chamber's front door is opened to remove sterilized product. Simultaneously, the rear chamber exhaust vent starts pulling air and remaining ethylene oxide from the chamber. Sterilization chamber rear exhaust vents (SN-78 through SN-83) and vacuum pumps are controlled by a scrubber (SN-101). The absorbed EtO is converted to ethylene glycol by acid-catalyzed reaction with water in the plug flow reactor. In order to keep from exceeding the maximum glycol concentration in the scrubber, small amounts

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of liquor are discharged periodically from the system into a 8,000 gallon holding tank (SN-88). Water is automatically replaced as required. Acid is automatically or manually replaced as well. Ethylene glycol production is limited by the throughput of ethylene oxide. Maximum of 550 lb/hr of ethylene oxide is evacuated to the scrubber based on history of cycle times and process flow.

In case of scrubber malfunction, rear chamber exhausts vents (SN-78 through SN-83) could be exhausted to the atmosphere. Emissions from the rear chamber exhaust vents (SN-78 through SN-83) are controlled through SN-101.

Product sterilized in any of the six sterilizers is moved to an aeration room to facilitate off gassing of the EtO. There are two (2) aeration rooms designated as aeration rooms #3 and #4 at the facility, currently controlled by the catalytic oxidizer (SN-94). Product can be moved to any of the two aeration rooms, and may be moved from one aeration room to another. Therefore, EtO emissions from the two aeration rooms are bubbled as though they were a single source.

Aeration rooms 3 and 4 vents (SN-76 and SN-77) are controlled by the catalytic oxidizer and vent as SN-94. During the period of shutdown or malfunction of the catalytic oxidizer, the emissions of ethylene oxide from the aeration room vents (SN-76 and SN-77) are routed directly to the atmosphere. Exhausters may be shutdown to prevent venting to the atmosphere.

It is anticipated that in case of vacuum pump(s) failure to draw ethylene oxide from sterilization chambers to the absorber tower, the EtO from the chambers will be vented to the atmosphere through steam ejectors SN-11 through SN-15, SN-57. This situation would be considered to be an upset condition. The modeling of short time period (1 hour) gas discharge from equipment opening (PUFF) for 200 lb sterilization chamber has shown that ethylene oxide concentration in the air outside the facility boundary at the ground level may exceed OSHA¹ 15 minute excursion limit. If the sterilizer vacuum pumps fail or malfunction, the vessels can only be evacuated manually. If the manual key switch is activated, the switch will enable the steam ejectors to pull gas from the chamber. This is not normal and would only be done in the case of an emergency, due to unsafe conditions (ex: LEL). The decision to manually evacuate the chambers is made by management only and would be documented on the sterilization record and reported in accordance with General Provision 8 of this permit.

The ethylene oxide is received in sealed drums. The handling of EtO drums is specified by Baxter's Document #14-03-05-002. According to the document, all the pipes must be filled with

¹ OSHA - Occupational Safety and Health Administration

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nitrogen prior to connection/disconnection operations (Section 4.4.A. of the Document). As a result, there are no ETO emissions to the atmosphere associated with drum handling. The handling of ETO drums according to alternative procedure (Section 4.4.B.) is considered an upset condition by the Department and should be reported in accordance with General Provision 8 (Section VIII of the permit).

The facility is subject to the EtO NESHAP (40 CFR Part 63, Subpart O). Pursuant to interim final rule dated December 4, 1997 and signed by Carol M. Browner, Administrator, EPA [Federal Register: December 9, 1997 (Volume 62, Number 236, Page 64736-64738)], the compliance due date was extended until December 6, 1999. The facility uses more than 10 tons of EtO in sterilization.

The NESHAP General Provisions, 40 CFR §63.6(e)(3), requires sources to prepare a startup, shutdown, and malfunction plan (the Plan). The purpose of the Plan is to “(C) reduce the reporting burden associated with periods of startup, shutdown, and malfunction”. However, the Subpart O does not contain any operation and maintenance plan requirements. The facility voluntarily has proposed to include the Plan in the permit to reduce the reporting burden associated with periods of startup, shutdown, and malfunction. In particular, the facility experiences power blinks, sometime as often as monthly. A power blink would trigger the catalytic oxidizer safety systems and shut the unit down. The startup cycle can take up to one (1) hour.

Specific Conditions

18. Pursuant to §19.501 of the Regulation of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 20.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
11-15, 57 ¹	Emergency Evacuation Only		
76-77 ¹	Emissions routed to SN-94		
78-83	Emissions routed to SN-101		
88	VOC	1.0	0.1
94	PM	0.1	0.2

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Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.2	0.5
	CO	0.1	0.5
	NO _x	0.5	2
101	VOC	1.1	1.3

¹ VOC (Ethylene Oxide) may be emitted only as a result of emergency or upset conditions.

19. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 20.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
11-15, 57 ¹	Emergency Evacuation Only		
76-77 ¹	Emissions routed to SN-94		
78-83	Emissions routed to SN-101		
88	Ethylene Glycol	1.0	0.05
94	Ethylene Oxide	0.15	0.33
101	Ethylene Oxide	1.1	1.13

¹ Ethylene oxide may be emitted only as a result of emergency or upset conditions.

20. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed usage of 331,000 pounds of ethylene oxide at the sterilization chambers for any consecutive twelve (12) month period.

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21. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 20 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to the Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
22. Pursuant to 40 CFR 63.360(a) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the facility is subject to the provisions of 40 CFR, Part 63, Subpart O, Ethylene Oxide Emissions Standards for Sterilization Facilities as a source using more than 10 tons of ethylene oxide (EtO) during any consecutive 12-month period. A copy of Subpart O is provided in Appendix A. Applicable provisions of Subpart O are included, but are not limited to, in Specific Conditions listed below.
23. Pursuant to 40 CFR 63.360(a) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall comply with the requirements of 40 CFR 63, Subpart A, General Provisions according to the applicability of general provisions to the facility in Table 1 (Appendix B).
24. Pursuant to 40 CFR 63.1(c) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall comply with the provisions of Subpart O according to the applicability of the emissions standards to the facility in Table 2 (Appendix C).
25. Pursuant to 40 CFR 63.362(a), 40 CFR 63.362(d) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall operate a catalytic oxidizer to reduce emissions to the atmosphere from each aeration room vent (SN-76 and SN-77) to a maximum concentration of 1 ppmv (Scenario #1) or by at least 99 percent (Scenario #2), whichever is less stringent (effective December 6, 1999).
26. Pursuant to 40 CFR 63.363(a) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, within 180 days after December 6, 1999, the permittee shall conduct an initial performance test (IPT) of the catalytic oxidizer (SN-94) using the procedures listed in §63.7 of Subpart A of 40 CFR 63 according to the applicability in Table 1 (Appendix B). (IPT conducted May 22-23, 2002)
27. Pursuant to 40 CFR 63.363(c)(1)(i) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304

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and §8-4-311, under Scenario #1, during the performance test required in Specific Condition 26, the permittee shall determine the concentration of ethylene oxide emitted from the aeration room into the atmosphere after the catalytic oxidizer (SN-94) using the methods in §63.365(c)(1) of 40 CFR 63, Subpart O.

28. Pursuant to 40 CFR 63.363(c)(1)(ii) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, under Scenario #2, during the performance test required in Specific Condition 26, the permittee shall determine the efficiency of the catalytic oxidizer using the test methods and procedures in §63.365(d)(1) of 40 CFR 63, Subpart O.
29. Pursuant to 40 CFR 63.363(c)(2) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, under Scenario #2, during the performance test required in Specific Condition 26, the permittee shall also establish as a site-specific operating parameter the baseline temperature using the procedures described in §63.365(f)(2) of 40 CFR 63, Subpart O.
30. Pursuant to General Condition 17, following the date on which the performance test of the catalytic oxidizer is completed, the permittee shall notify the Department under which scenario the source is operating.
31. Pursuant to 40 CFR 63.364(c)(4) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall install, calibrate, operate, and maintain a temperature monitor accurate to within $\pm 5.6^{\circ}\text{C}$ (± 10 EF) to measure the oxidation temperature.
32. Pursuant to 40 CFR 63.363(c)(3)(ii) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not operate the facility with the oxidation temperature, averaged over three hours, more than 5.6°C (10 EF) below the baseline oxidation temperature (effective May 24, 2002).
33. Pursuant to 40 CFR 63.364(c)(2), 40 CFR 63.364(f) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall continuously monitor and record the oxidation temperature at the outlet to the catalyst bed or at the exhaust point from the thermal combustion chamber using the temperature monitor described in 40 CFR 63.364(c)(4). A data acquisition system for the temperature monitor shall compute and record an average oxidation temperature each hour and a 3-hour block average every third hour.
34. Pursuant to 40 CFR 63.365(f)(2) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the facility shall establish the baseline temperature for the aeration room vent as the temperature for the catalytic oxidation unit or the oxidation temperature at the exhaust point from the thermal oxidation unit averaged over three test runs using the procedures in

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40 CFR 63.365(d)(1).

35. Pursuant to 40 CFR 63.365(h) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, an owner or operator seeking to demonstrate compliance with the standards found at §63.362 (d) or (e) with a monitoring device or procedure other than a gas chromatograph shall provide to the Department information describing the operation of the monitoring device or procedure and the parameters that would indicate proper operation and maintenance of the device or procedure. The Department may request further information and will specify appropriate test methods and procedures.
36. Pursuant to 40 CFR 63.362(a), 40 CFR 63.362(c), 40 CFR 63.362(e)(1), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall operate an acid-water scrubber (SN-101) to reduce emissions to the atmosphere from the vacuum pumps (SN-11 through SN-15 and SN-57) and the sterilization chamber rear exhaust vents (SN-78 through SN-83).
37. Pursuant to 40 CFR 63.363(a), (b) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall conduct a performance test of the acid-water scrubber (SN-101) using the procedures listed in §63.7 of Subpart A of 40 CFR 63 according to the applicability in Table 1 (Appendix B), the procedures listed in sections 63.363(b), and the test methods listed in §63.365(b)(1) of Subpart O. The facility shall also establish the maximum ethylene glycol concentration or maximum scrubber tank level as an operating parameter using the procedures described in 63.365(e). (performance test conducted May 22-23, 2002)
38. Pursuant to 40 CFR 63.363(b)(2)(i) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, operation of the facility with an ethylene glycol concentration in the scrubber liquor in excess of the maximum ethylene glycol concentration or the liquor tank level in excess of the maximum liquor tank level shall constitute a violation of the sterilization chamber vent standard.
39. Pursuant to 40 CFR 63.364(b) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall sample the scrubber liquor, analyze, and record once per week the ethylene glycol concentration of the scrubber liquor or measure and record once per week the level of the scrubber liquor in the recirculation tank using the test methods and procedures in 63.365(e). Monitoring is required during a week only if the scrubber has been operated; or measure and record once per week the level of the scrubber liquor in the recirculation tank. The owner or operator shall install, maintain, and use a liquor level indicator to measure the scrubber liquor tank level.
40. Pursuant to General Condition 17, the permittee shall notify the Department under which

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testing scenario the facility is operating.

41. Pursuant to 40 CFR 63.364(f) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall monitor the control device to which emissions from the rear chamber exhaust are manifolded using requirements in 63.364(b).
42. Pursuant to 40 CFR 63.367(a) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall comply with the recordkeeping requirements in §63.10(b) and (c) of Subpart A, according to the applicability in Table 1 (Appendix B).
43. Pursuant to 40 CFR 63.6(e)(3)(i) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall develop and implement a written startup, shutdown, and malfunction plan (the Plan) that describes, in detail, procedures for operating and maintaining the catalytic oxidizer (SN-94) and sources controlled by the oxidizer during periods of startup, shutdown, and malfunction and a program of corrective action.
44. Pursuant to 40 CFR 63.6(e)(3)(v) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the written Plan shall be kept at the facility for the life of SN-94 and shall be made available for inspection by Department personnel upon request. If the Plan is revised, the permittee shall keep all previous versions for 5 years after each revision and make them available for inspection.
45. Pursuant to 40 CFR 63.6(e)(3)(ii) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, during periods of startup, shutdown, and malfunction, the permittee shall operate the catalytic oxidizer (SN-94) in accordance with the procedures specified in the Plan developed under Specific Condition 43.
46. Pursuant to 40 CFR 63.6(e)(3)(iii) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall keep records for all actions taken during a startup, shutdown, or malfunction (including actions taken to correct a malfunction). The permittee shall keep records of these events as specified in 40 CFR 63.10(b). If period of shutdown did not exceed one (1) hour, the permittee does not have to report to the Department.
47. Pursuant to 40 CFR 63.6(e)(3)(iv) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if an action taken by the permittee during a startup, shutdown, and malfunction (including an action taken to correct malfunction) is not consistent with the procedures specified in the Plan, particularly, if shutdown period exceeded one (1) hour, the permittee shall report such actions to the Department in accordance with General Provision 8 (Section VII of the permit).

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48. Pursuant to 40 CFR 63.10(b)(5)(i) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall submit semiannually startup, shutdown, and malfunction reports to the Department. The report shall be due within 30 days of the end of the reporting period. The report shall consist of a letter, containing the name, title, and signature of the responsible official as defined in §26.2 of Regulation 26 and shall state all actions taken during a startup, shutdown, and malfunction of SN-94 (including actions taken to correct a malfunction).

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SN-16: Lasker Boiler

SN-17: Babcock & Wilcox Boiler

SN-100: Fuel #2 Storage Tank

Source Description

Currently, there are two boilers at the facility: Lasker boiler (SN-16) and Babcock & Wilcox boiler (SN-17).

The Lasker boiler with the maximum design heat input capacity of 35 million Btu per hour (Btu/hr) (SN-16) was installed in 1964. The Babcock & Wilcox boiler with the maximum design heat input capacity of 42.8 million Btu per hour (Btu/hr) (SN-17) was installed in 1975. In June, 1978, permit #530-A, the facility (formerly Travenol Laboratories, Inc.) was permitted to install three (3) boilers. The third boiler was never installed and was removed from permit #544-AR-6 in September, 1990. In 1980, the facility was permitted to use No.5 fuel oil in their boilers as a backup fuel.

The facility was never required to perform stack testing of the emissions from the boilers.

The fuel oil #2 used as a back up fuel is stored in three (3) 15,000 gallon storage tanks (SN-100). The fuel oil throughput at the storage tanks is limited by the limit of the fuel usage in the boilers. Two tanks were installed in 1964 and one tank was installed in 1975. The storage tanks are not subject to the provisions of 40 CFR, Part 60, Subpart K because each individual tank's capacity is less than 40,000 gallons.

Specific Conditions

49. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 50, 52, and 53.

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Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
16	Natural Gas Combustion		
	PM/PM ₁₀	0.5	2.2
	SO ₂	0.1	0.5
	VOC	0.1	0.4
	CO	1.3	5.7
	NO _x	4.9	21.2
	Fuel #2 Combustion		
	PM/PM ₁₀	0.5	0.4
	SO ₂	17.6	12.7
	VOC	0.1	0.1
	CO	1.3	1.0
	NO _x	5.0	3.6
	Total Emission		
	PM/PM ₁₀	0.5	2.6
	SO ₂	17.6	13.2
	VOC	0.1	0.5
	CO	1.3	6.7
NO _x	5.0	24.8	

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Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
17	Natural Gas Combustion		
	PM/PM ₁₀	0.6	2.6
	SO ₂	0.1	0.4
	VOC	0.1	0.4
	CO	1.5	6.5
	NO _x	5.8	25.1
	Fuel #2 Combustion		
	PM/PM ₁₀	0.6	0.5
	SO ₂	21.1	15.2
	VOC	0.1	0.1
	CO	1.5	1.1
	NO _x	6.0	4.4
	Total Emission		
	PM/PM ₁₀	0.6	3.1
	SO ₂	21.1	15.6
VOC	0.1	0.5	
CO	1.5	7.6	
NO _x	6.0	29.5	
100 ²	VOC	6.0	0.1

50. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall use only No.2 fuel oil that contains 0.5% or less sulfur by weight as a back-up fuel in the boilers (SN-16 and SN-17).³
51. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain certifications from the fuel supplier which demonstrate compliance with the limits set in Specific Condition 50 and may be used by the Department for enforcement purposes.

² VOC emissions are limited by the usage of fuel #2 in the boilers (Specific Condition 53).

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Fuel supplier certification for No.2 oil fuel shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c of 40 CFR 60. The certifications shall be kept on site, and shall be provided to Department personnel upon request.

52. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed natural gas usage throughput of 1,012,800,000 cubic feet for any consecutive twelve (12) month period.
53. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed No.2 fuel oil throughput of 1,211,000 gallons for any consecutive twelve (12) month period.
54. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions 52 and Specific Condition 53 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
55. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from SN-16 and SN-17 while burning natural gas, and the permittee shall not exceed 20% opacity from SN-16 and SN-17 while burning No.2 fuel oil. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 56 and 57.
56. Pursuant to §19.703 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from SN-16 and SN-17 while burning natural gas. If visible emissions are detected, then the permittee shall immediately conduct a 6-minute opacity reading in accordance with EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 58.
57. Pursuant to §19.703 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, in the event the permittee burns fuel oil for

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three (3) hours or more in any consecutive 24 hour period or a total of 14 hours⁴ or more in any consecutive 12 month period, the permittee shall conduct a 6-minute opacity reading from each boiler while burning No. 2 fuel oil. Should the burning of fuel oil continue for seven (7) or more consecutive days, the permittee shall conduct a 6-minute opacity reading from each boiler again on the seventh day and every seven (7) days thereafter as long as fuel oil is being burned.

58. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the type of fuel burned in the boilers and opacity readings or observations which demonstrate compliance with the limits set in Specific Conditions 55 through 57 and may be used by the Department for enforcement purposes. The records shall be updated on a weekly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
59. Pursuant to §19.702 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall perform stack testing of SN-16 and SN-17 for carbon monoxide (CO) and nitrogen oxides (NO_x) emissions while burning natural gas. Testing shall be performed no later than 180 days after the current permit is issued in accordance with Plantwide Condition 5 and EPA Reference Methods 10 & 7E, respectively, as found in 40 CFR, Part 60, Appendix A.
60. Pursuant to §19.702 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall perform stack testing of SN-16 and SN-17 for carbon monoxide (CO) and nitrogen oxides (NO_x) emissions while burning No. 2 fuel oil. Testing shall be performed no later than sixty (60) days after the permittee burns 121,100 gallons (10 percent of the permitted annual throughput) or more of No. 2 fuel oil for any consecutive 12 month period. Testing shall be performed in accordance with Plantwide Condition 5 and EPA Reference Methods 10 and 7E, respectively, as found in 40 CFR, Part 60, Appendix A.

⁴ Burning fuel oil in all boilers for 14 hours represents less than one (1) percent of the total annual permitted fuel oil consumption.

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SN-21: Ovens for Needles Covers

Source Description

PVC needle covers are sent to electric ovens for curing. The needle covers are heated in the ovens for about 45 minutes at 250EF. The following hazardous air pollutants (HAP) are emitted during the process: bis(2-ethylhexyl)phthalate (DEHP) and hydrogen chloride (HCl). There are eight (8) ovens. All ovens exhaust to the atmosphere through one stack (SN-21).

The ovens were installed in 1986 and permitted as SN-21 through SN-27 in permit #544-AR-3.

Specific Conditions

61. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutants (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 62.

Source No.	HAP	Emission Rate (lb/hr)	Emission Rate (tpy)
21	DEHP	0.1	0.44
	HCl	0.1	0.44

62. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a throughput of 48 million needle covers at SN-21 for any consecutive twelve month period.
63. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 62 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

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SN-41: Grinding Operation

Source Description

The waste plastic from the facility is ground into granular material suitable for recycling. Waste plastic is fed to a mechanical grinder. It is assumed that 98% of the plastic fed to the grinder is routed directly to silos. The remaining 2% is captured as particulate matter and routed through a cyclone to a baghouse (SN-41). The plastic captured by the cyclone is fed to the silos. The silos are controlled by the same baghouse. The equipment was installed in 1978. SN-41 was permitted for the first time in 1986 in permit No. 544-AR-3.

Specific Conditions

64. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall not exceed the annual emission rate set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 69.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
41	PM/PM ₁₀	2.5	11.0

65. Pursuant to §19.7 of Regulation 19 and 40 CFR, Part 52, Subpart E, the permittee shall perform stack testing of SN-41 for PM/PM₁₀ emissions. Testing shall be performed after the second grinder is installed in accordance with Plantwide Conditions 4 & 5 and EPA Reference Methods 1 through 5 as found in 40 CFR, Part 60, Appendix A.
66. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from SN-41. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Conditions 67 and 71.
67. Pursuant to §19.703 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from SN-41. If visible emissions are detected, the permittee shall conduct a 6-minute opacity reading in accordance with EPA Reference Method 9.

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68. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions 66 and 67 and may be used by the Department for enforcement purposes. The records shall be updated on a weekly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
69. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 11,700 tons of waste plastic being ground for any consecutive twelve month period.
70. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with Specific Condition 69 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
71. Pursuant to §18.1003 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall conduct preventive maintenance of the baghouse (SN-41) every 3 months. The preventive maintenance shall include the following: check filter bank for loose filter clamps; check filters for holes; check shaker system and linkage. Filters shall be changed as needed when indicative of preventive maintenance.
72. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with Specific Condition 71 and may be used by the Department for enforcement purposes. The records shall be updated every three months, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-44: Paint Booth/Maintenance Painting

Source Description

Equipment painting is ongoing as part of routine maintenance. Facility painting can occur anywhere inside or outside of the plant. On some cases, pieces of equipment are brought into the paint booth for painting. Both solvent based and water based paints are used. Some paints contain volatile HAPs. All volatile HAPs in these paints have a relative toxicity of 1.0.

Paint booth was permitted first time in 1986, permit #544-AR-3.

Specific Conditions

73. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rate set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 75.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
44	VOC	60	12.0

74. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Conditions 77 and 78.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
44	HAPs with relative toxicity 1.0	60	6.0

75. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, VOC content for all paint shall not exceed 24,000 pounds for any consecutive twelve month period.
76. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air

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Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 75 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

77. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not use raw materials containing volatile hazardous air pollutants with relative toxicity less than 1.0.
78. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, HAP content for all raw materials shall not exceed 12,000 pounds for any consecutive twelve month period.
79. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions 77 and 78 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

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SN-45: Grinder #1

Process Description

The Needles process is used to produce and assemble needles for various blood collection products. The stainless steel cannula comes from a supplier. The cannula is taped and the tip is ground. Water used to cool the grinding wheel captures the majority of PM generated. A hood over the grinding process captures some PM which is emitted to the atmosphere through the fabric filter (SN-45). The needles are manufactured from #304 stainless steel which contains 18-20% chromium and <2% manganese, both listed as inorganic HAP. The equipment was installed in 1986. SN-45 was permitted for the first time in 1986 in permit No. 544-AR-3. In 1994, SN-45 was removed from service (permit No. 544-AR-7).

Specific Conditions

80. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Conditions 82 and 84.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
45	PM/PM ₁₀ *	0.1	0.5

81. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Conditions 82 and 84.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
45	Chromium Compounds	0.017	0.018
	Manganese Compounds	0.0017	0.0018

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82. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 70,000,000 cannula throughput for any consecutive twelve month period.
83. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 82 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
84. Pursuant to §18.1003 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall conduct preventive maintenance of the baghouse SN-45 every month. The filters shall be changed annually.
85. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 84 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-72: Jet Cleaner

Process Description

The Jet Cleaner consists of a closed insulated chamber with internal heaters, into which parts are placed for cleaning. The Jet Cleaner cleans PVC and other residue polymers off of steel plates used in extrusion of plastic tubing/film. It cleans using a pyrolysis cleaning cycle at full vacuum followed by an oxidation cycle at reduced vacuum. All heat is provided by electric heating elements. A primary trap beneath the chamber collects polymer which drains from the parts. A secondary trap, fitted with water spray nozzles, condenses and collects vapors before they can enter the vacuum pump. There are two Jet Cleaners in the room. After the steel plates are removed from the cleaner, they are cooled and blasted using a totally enclosed glass-bead blaster. The unit vents inside the room. There are two hoods located over each Jet Cleaner. Both hoods vent to the atmosphere through the same roof vent (SN-72).

Specific Conditions

86. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rate set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 87.

Source No.	HAP	Emission Rate (lb/hr)	Emission Rate (tpy)
72	DEHP	0.03	0.1

87. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 21,000 steel plates being cleaned during any consecutive twelve month period.
88. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 87 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

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SN-85: Print Shop

Process Description

The print shop prints miscellaneous forms and labels. The soybean based ink is used for printing. There is no VOC emitted from the ink. Varn is the chemical used as a cleaning agent for equipment and associated parts. Varn contains 15% methylene chloride (MeCl), a non-VOC listed HAP. The print shop also makes lead slugs for stamps and labels.

Specific Conditions

89. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 91.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
85	VOC	2.0	0.2

90. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rate set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 91.

Source No.	HAP	Emission Rate (lb/hr)	Emission Rate (tpy)
85	MeCl	0.3	0.02

91. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed usage of 50 gallons of Varn for any consecutive twelve month period.

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92. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 91 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

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SN-89, SN-90: DEHP Storage Tanks

Process Description

There are two 20,000 gallons storage tanks. Both tanks were installed in 1971. Both tanks are being permitted for the first time. DEHP, bis(2-ethylhexyl)phthalate, is a listed HAP, CAS # 117-81-7. DEHP is used as a raw material in the Plastic process.

Specific Conditions

93. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 94.

Source No.	HAP	Emission Rate (lb/hr)	Emission Rate (tpy)
89	DEHP ⁵	0.5	0.1
90	DEHP ¹	0.5	0.1

94. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total DEHP throughput of 39,200,000 pounds (4,750,000 gallons) for any consecutive twelve month period.
95. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 94 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

⁵ DEHP is also a volatile organic compound (VOC)

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SN-93, SN-99: Pallet Treatment Process

Process Description

Wooden shipping pallets have been identified as a possible contributor to an insect infestation within the facility.

A dry kiln chamber (SN-91) was permitted (permit No. 544-AR-9) for heat treatment of the pallets. The pallets should be heated at approximately 150EF up to 5 hours. It is a batch process. Heating is provided by 880,000 BTU/hr furnace burning natural gas. Air and products of combustion are circulated during the treatment. There are two vents on the top of the kiln to release pressure over 10 psig. Venting to the atmosphere takes place during unloading operations through the door. VOC emissions are associated with the heat treatment of hardwood in dry kilns.

An oven chamber (SN-93, SN-99) was permitted in 544-AOP-R0. Heat is provided from the plant boilers (SN-16, SN-17). It is also a batch process. VOC will be vented through a stack and through a door during unloading operations.

Specific Conditions

96. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 97.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
93, 99	VOC	2.5	0.8

97. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total hardwood pallets throughput of 1,265,125 board feet for any consecutive twelve month period for oven chamber (SN-93, 99).

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98. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 97 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

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SN-95: Plastics Manufacturing

Process Description

Blending. Raw materials are received in both bulk and packaged for manufacturing of plastic film and tubing. The first step is blending. Resins, plasticizer and minor ingredients are combined in high intensity blender, ribbon blender or drum tumbler and mixed. The blend is then sent to the film extrusion area, pelletizing area, or exported to other locations for processing.

Pelletizing. Blend is extruded into pellets using extruders. Once pellets are produced, they are sent to the tubing or film area or exported to other locations for processing.

Tubing Extrusion. Pellets or blend are fed to an extruder through a hopper. The extruder heats pellets or blend to melt and pumps the melt through a die to form tubing. The extruded tubing is fed through a water trough for cooling prior to being cut or spooled.

Film. Blend or pellets are received at film lines in hoppers or auto-transferred from blending. Blend or pellets are fed into an extruder where they are melted and pumped through a wide die forming a wide sheet. The sheet is fed through a chill roll stack to cool and then is fed through a winding system to spool into rolls. The rolls are sent to other areas or locations for further processing.

Grinding. Excess or scrapped plastic is fed into a grinder (SN-41). The ground material is fed into silos and later transferred to the blend area to be mixed with blend used for film production.

Small amounts of miscellaneous fugitive VOCs may result from the above described operations. The pollutant of concern is bis(2-ethylhexyl)phthalate (DEHP), a listed HAP. Fugitive DEHP emissions are captured with ventilation equipment from pelletizing, tubing extrusion, and film extrusion processes and routed to filters. Filters contain activated carbon that adsorbs DEHP. De minimis amounts of methyl ethyl ketone (a listed HAP) may also be emitted during above mentioned operations. A total of 15 filters are used in plastics manufacturing. The filters are either roof mounted or located within the building. In either case, effluent from the filters is routed back into the warehouse. As such, no emissions are directly discharged to the atmosphere, but rather are all fugitive. Also included in SN-95 are emissions from inside DEHP storage tanks.

The proposed maximum emission rates reflect increase of the plastics production rate. The actual fugitive VOC and HAP emission rates will increase approximately 30%.

The plastics manufacturing process was installed in 1971.

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Specific Conditions

99. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 101.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
95	VOC	2.0	8.9

100. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 103.

Source No.	Pollutants	Emission Rate (lb/hr)	Emission Rate (tpy)
95	DEHP	1.21	4.57

101. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed manufacturing of 100,000,000 pounds of plastic pellets/tubing and 150,000,000 pounds of plastic sheeting during any consecutive twelve month period.

102. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 101 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

103. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total throughput of 39,200,000 pounds of DEHP during any consecutive twelve

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month period.

104. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 103 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.
105. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not emit any hazardous air pollutants from SN-95 other than DEHP and methyl ethyl ketone⁶.
106. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain material safety data sheets (MSDS) on all resins, plasticizers, solvents, and minor ingredients used at the plastics manufacturing process which demonstrate compliance with the limit set in Specific Condition 105 and may be used by the Department for enforcement purposes. The data sheets shall be kept on site and shall be provided to Department personnel upon request.
107. Pursuant to §18.1003 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall conduct preventive maintenance of the Farr Absolute HEPA filters quarterly. The activated carbon shall be changed every eighteen (18) months.
108. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with Specific Condition 107 and may be used by the Department for enforcement purposes. The records shall be kept on site and shall be provided to Department personnel upon request.

⁶ Emissions of methyl ethyl ketone are bubbled throughout the plant and limited by Specific Condition 110.

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SN-97: Plant Fugitive VOC Emissions

Process Description

The facility produces disposable medical products including blood bags, kidney dialysis sets, needles, and molded parts. In addition, the plant produces large volumes of medical grade plastics. As a result of these operations, many sources of fugitive VOC emissions are located throughout the plant. The fugitive VOC emissions result from sets assembly, cleaning operations, needles manufacturing and small miscellaneous uses.

Currently, the facility annually consumes 220,000 pounds of VOC (excluding ethylene oxide and DEHP, which are HAPs and tracked separately) and collects and ships offsite 67,500 pounds of VOC. 14,000 pounds of VOC are emitted annually through stacks (SN-04, SN-07, SN-09, SN-95). The rest of the VOC evaporate within the building and is released to the atmosphere through doors, windows, and other openings. It is proposed to bubble all plant fugitive VOC emissions as a single source. The annual emission rate is estimated according to the following equation:

$$\text{Fugitive VOC} = \text{VOC usage} - \text{VOC collected} - \text{VOC released through stacks} = 138,500 \text{ lb/yr.}$$

The facility estimates that it will increase consumption of VOC up to 440,000 pounds per year by the end of the 5-year period this permit is valid. Therefore, it is estimated that fugitive emissions will double over five year period.

Specific Conditions

109. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 111.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
97	VOC	230	148.5

110. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with

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Specific Condition 113.

Source No.	Pollutants	Emission Rate (lb/hr)	Emission Rate (tpy)
97	Methyl Ethyl Ketone	5.0	2.5

111. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total usage of 440,000 pounds of VOCs (excluding ethylene oxide and DEHP) during any consecutive twelve month period.
112. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR, Part 52, Subpart E, the permittee shall maintain records of fugitive VOC emissions which demonstrate compliance with the limits set in Specific Condition 109 and may be used by the Department for enforcement purposes. The emissions shall be calculated according to the following formula:

$$\text{Fugitive VOC} = \text{VOC usage} - \text{VOC collected} - 14,000 \text{ lbs}^7$$

The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

113. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total usage of 5,000 pounds of methyl ethyl ketone during any consecutive twelve month period.
114. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records of methyl ethyl ketone usage which demonstrate compliance with the limits set in Specific Condition 113 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall

⁷ 14,000 lbs is a conservative estimation of annual combined stack VOC emissions.

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be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General Provision 7.

115. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain material safety data sheets (MSDS) of all volatile organic compounds (VOC) used at the facility. The records shall be kept on site and shall be provided to Department personnel upon request.

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SN-102: Methylene Chloride Etching

Process Description

Baxter is developing a new product line called **Alyx**. This product contains a component that must be subject to an overmolding process. This process molds a plastic component over another plastic component to create a functional portion of the end product. During the overmolding, an elastomer end is molded onto each end of an extruded tube. To insure adequate adhesion of the over molded part, the tubes must be treated with methylene chloride prior to the overmolding process. The use of MeCl etches the surface and imparts a porous finish onto the tubing surface. The MeCl also makes the surface soft and tacky. The surface layer of the tubing is melted after the application of the solvent and resolidifies after the solvent flashes off.

SN-102 was installed in July of 2001.

Specific Conditions

116. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 117.

Source No.	Pollutants	Emission Rate (lb/hr)	Emission Rate (tpy)
102	Methylene Chloride	0.37	1.63

117. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total usage of 4,000 pounds of methylene chloride during any consecutive 12 month period.

118. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records of methylene chloride usage which demonstrate compliance with the limits set in Specific Condition 117 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with Plantwide Condition 7 and General

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Provision 7.

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SN-104: Syntra Dialyzer

Process Description

A Syntra dialyzer is the disposable device used in kidney dialysis machines. The unit consists of a bundle of hollow fibers which are sealed into a plastic casing. The fibers are purchased from an outside supplier. Fibers are placed into a plastic case which is capped in the Case/Bundle assembly area. Caps are attached with a snap-on fit. The units are then sent to a centrifuge potting (SN-104) system where the fibers are sealed in place with urethane. The urethane is made by mixing two raw components and injecting the material into the filters. After the urethane has hardened, the individual units are cut and sent to final assembly and packaging areas. One of the components for the urethane is HMDI (non- HAP, VOC).

119. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated through compliance with Specific Condition 120.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
104	VOC	0.1	0.1

120. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a total usage of 963,000 pounds of HMDI during any consecutive 12 month period.
121. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records of HMDI usage which demonstrate compliance with the limits set in Specific Condition 120 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SECTION V: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. Pursuant to §19.702(D) of Regulation 19, unless otherwise approved by the Department, all air contaminant emissions sampling shall be performed with the equipment being tested operating at least at 90% of its permitted capacity. Emissions results shall be extrapolated to correlate with 100% of permitted capacity to determine compliance. Failure to test at the permitted capacity shall limit the facility to 10 percent above the tested capacity.

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6. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation 26, the first reporting period shall end on the last day of the six months anniversary of this permit. The permittee shall submit the first report of all required monitoring within 30 days of the end of the first reporting period. The first report shall contain six months of data. The following reports shall be submitted in accordance with General Provision 7.
8. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

Acid Rain (Title IV)

9. Pursuant to §26.701 of Regulation #26 and 40 CFR 70.6(a)(4), the permittee is prohibited from causing any emissions which exceed any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder. No permit revision is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement of this permit or the Act. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Act.

Title VI Provisions

10. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement

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except as described in §82.112.

11. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §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 §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §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 §82.166.
12. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
13. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

14. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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15. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated June 25, 1996.

Source No.	Regulation	Description
Facility	Arkansas Regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program
SN-07	40 CFR, Part 82	Protection of Stratospheric Ozone
SN-18	40 CFR, Part 60, Subpart A	Standards of Performance for New Stationary Sources. General Provisions
SN-18	40 CFR, Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
SN-58	40 CFR, Part 63, Subpart A	National Emission Standards for Hazardous Air Pollutants for Source Categories. General Provisions.
SN-58	40 CFR, Part 63, Subpart O	Ethylene Oxide Emissions Standards for Sterilization Facilities
SN-74 through SN-83	40 CFR, Part 63, Subpart A	National Emission Standards for Hazardous Air Pollutants for Source Categories. General Provisions.
SN-74 through SN-83	40 CFR, Part 63, Subpart O	Ethylene Oxide Emissions Standards for Sterilization Facilities
SN-94	40 CFR, Part 63, Subpart A	National Emission Standards for Hazardous Air Pollutants for Source Categories. General Provisions.
SN-94	40 CFR, Part 63, Subpart O	Ethylene Oxide Emissions Standards for Sterilization Facilities

B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated June 25, 1996.

Source	Regulation	Description	Basis for Determination

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Source	Regulation	Description	Basis for Determination
SN-16, SN-17	40 CFR, Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Boilers were constructed in 1964 and 1975 respectfully.
SN-89 and SN-90	40 CFR, Part 60, Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 1, 1973, and Prior to May 19, 1978.	Both tanks were constructed in 1971.
SN-100	40 CFR, Part 60, Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 1, 1973, and Prior to May 19, 1978.	The storage tank's capacity is less than 40,000 gal.

C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

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SECTION VI: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated June 25, 1996 and May 15, 2001.

Description	Category
Resin Storage Silo 3A (former SN-59)	Group A. 13
Resin Storage Silo 4A (former SN-60)	Group A. 13
Resin Storage Silo 4B (former SN-61)	Group A. 13
Resin Storage Silo 5 (former SN-62)	Group A. 13
Resin Storage Silo 3B (former SN-63)	Group A. 13
Resin Storage Silo 3C (former SN-64)	Group A. 13
Resin Storage Silo (former SN-65)	Group A. 13
Resin Storage Silo (former SN-66)	Group A. 13
Chillers #1-3 (former SN-67)	Group A. 1
Chiller #5 (former SN-68)	Group A. 1
Chiller #4 (former SN-69)	Group A. 1
Needles Silicone	Group A. 13
Needles Cleaning/Electropolishing	Group A. 13
E-beam Ionizing Radiation	Group A. 13
Cell Separator Coiling Operation	Group A. 13
Vacuum Pumps	Group A. 13
Dust Collector (PE172) Home Choice	Group A. 13
30,000 gal Emergency Fuel Oil #2 Storage Tank (empty under normal conditions)	Group A. 12
570 gal Diesel Fuel Tank	Group A. 3
300 gal Diesel Fuel Tank	Group A. 3
Linseed Oil, Epoxidized (LOE) Storage Tank	Group A. 4
Linseed Oil, Epoxidized (LOE) Storage Tank	Group A. 4
Linseed Oil, Epoxidized (LOE) Storage Tank	Group A. 4
Linseed Oil, Epoxidized (LOE) Storage Tank	Group A. 4

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Epoxol Storage Tank	Group A. 4
Epoxol Storage Tank	Group A. 4
Epoxol Storage Tank	Group A. 4
Vikoflex Storage Tank	Group A. 4
Vikoflex Storage Tank	Group A. 4
Citroflex Storage Tank	Group A. 4
Citroflex Storage Tank	Group A. 4
Vikoflex Storage Tank	Group A. 4
Vikoflex Storage Tank	Group A. 4
Laboratories	Group A. 5
Nitric Acid Tanks	Group A. 3
Sodium Hydroxide Tanks	Group A. 3
500 gal Propane Tank	Group A. 3
Cyclo Station in Fenwal	Group A. 13
Dextrose Solution Tank	Group A. 3
Salt Tank	Group A. 3
Salt Brine Tank	Group A. 3
Distilled Water Tank	Group A. 3
De-aeration Tank	Group A.3
Isolex 300 Process	Group A. 3
Molding Process (SN-96)	Group A. 13
Needle Blasting	Group A. 13
PHAPs (Particulate Hazardous Air Pollutants) paint usage	Group A. 13
Diapes Dialyzer Drying System	Group A. 13
E-Beam Ionizing Radiation (SN-103)	Group A. 13
Laser Sealing of Syntra Dialyzer (SN-106)	Group A. 13
Hot Air Vents	Group B. 36

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.406 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
 - i. The date, place as defined in this permit, and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;

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- iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
- i. The facility name and location,
 - ii. The process unit or emission source which is deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,

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- vi. The average emissions during the deviation,
- vii. The probable cause of such deviations,
- viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- ix. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include, in addition to the information required by initial report, a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or

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

13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

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19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - i. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - i. The identification of each term or condition of the permit that is the basis of the certification;
 - ii. The compliance status;
 - iii. Whether compliance was continuous or intermittent;
 - iv. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - v. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:

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- i. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - ii. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - iv. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

APPENDIX B

TABLE 1. 40 CFR Part 63, Subpart A applicability to Baxter Healthcare Corporation

Reference	Applicability	Comment
63.1(a)(1)	Yes	Additional terms defined in § 63.361; when overlap between subparts A and O occurs, subpart O takes precedence.
63.1(a)(2)	Yes	
63.1(a)(3)	Yes	
63.1(a)(4)	Yes	Subpart O clarifies the applicability of each paragraph in subpart A to sources subject to subpart O
63.1(a)(5)	No	Reserved
63.1(a)(6)	Yes	
63.1(a)(7)	Yes	
63.1(a)(8)	Yes	
63.1(a)(9)	No	Reserved
63.1(a)(10)	Yes	
63.1(a)(11)	Yes	§ 63.366(a) of subpart O also allows report submissions via fax and on electronic media.
63.1(a)(12)-(14)	Yes	
63.1(b)(1)-(2)	Yes	
63.1(b)(3)	No	<i>§ 63.367 clarifies the applicability of recordkeeping requirements for sources that determine they are not subject to the emissions standards.</i>
63.1(c)(1)	Yes	Subpart O clarifies the applicability of each paragraph in subpart A to sources subject to subpart O in this table.
63.1(c)(2)	Yes	Subpart O also specifies which sources are required to obtain a Title V permit in § 63.360.
63.1(c)(3)	No	Reserved
63.1(c)(4)	Yes	
63.1(c)(5)	No	§ 63.360 specifies applicability.
63.1(d)	No	Reserved
63.1(e)	Yes	
63.2	Yes	Additional terms defined in § 63.361; when overlap between subparts A and O occurs, subpart O takes precedence.
63.3	Yes	Other units used in subpart O are defined in the text of subpart O.
63.4(a)(1)-(3)	Yes	
63.4(a)(4)	No	Reserved
63.4(a)(5)	Yes	
63.4(b)	Yes	
63.4(c)	Yes	
63.5(a)	No	<i>§ 63.366(b)(1) contains applicability requirements for constructed or reconstructed sources.</i>
63.5(b)(1)	Yes	
63.5(b)(2)	No	Reserved
63.5(b)(3)	No	<i>See § 63.366(b)(2)</i>

Reference	Applicability	Comment
63.5(b)(4)	Yes	
63.5(b)(5)	Yes	
63.5(b)(6)	Yes	
63.5(c)	No	Reserved
63.5(d)(1)-(2)	No	<i>See § 63.366(b)(3).</i>
63.5(d)(3)-(4)	Yes	
63.5(e)	Yes	
63.5(f)(1) and (2)	No	<i>See § 63.366(b)(4).</i>
63.6(a)(1)	Yes	
63.6(a)(2)	No	<i>§ 63.360 specifies applicability.</i>
63.6(b) and (c)	No	<i>§ 63.360(g) specifies compliance dates for sources.</i>
63.6(d)	No	Reserved
63.6(e)	No	Subpart O does not contain any operation and maintenance plan requirements.
63.6(f)(1)	No	<i>§ 63.362(b) specifies when the standards apply.</i>
63.6(f)(2)(i)	Yes	
63.6(f)(2)(ii)	No	<i>§ 63.363 specifies parameters for determining compliance.</i>
63.6(f)(2)(iii)-(iv)	Yes	
63.6(f)(2)(v)	No	
63.6(f)(3)	Yes	
63.6(g)	Yes	
63.6(h)	No	Subpart O does not contain any opacity or visible emission standards.
63.6(i)(1)-(14)	Yes	
63.6(i)(15)	No	Reserved
63.6(i)(16)	Yes	
63.6(j)	Yes	
63.7(a)(1)	Yes	
63.7(a)(2)	No	<i>§ 63.365(a)(2) specifies performance test dates.</i>
63.7(a)(3)	Yes	
63.7(b)	Yes	
63.7(c)	Yes	
63.7(d)	Yes	
63.7(e)	Yes	<i>§ 63.365 also contains test methods specific to sources subject to the emissions standards.</i>
63.7(f)	Yes	
63.7(g)(1)	Yes	
63.7(g)(2)	No	Reserved
63.7(g)(3)	Yes	
63.7(h)	Yes	
63.8(a)(1)	Yes	
63.8(a)(2)	Yes	
63.8(a)(3)	No	Reserved

Reference	Applicability	Comment
63.8(a)(4)	Yes	
63.8(b)(1)	Yes	
63.8(b)(2)	Yes	
63.8(b)(3)	No	
63.8(c)(1)(i) and (ii)	No	A startup, shutdown, and malfunction plan is not required for these standards.
63.8(c)(1)(iii)	Yes	
63.8(c)(2)-(3)	Yes	
63.8(c)(4)-(5)	No	<i>Frequency of monitoring measurements is provided in § 63.364; opacity monitors are not required for these standards.</i>
63.8(c)(6)	No	<i>Performance specifications for gas chromatographs and temperature monitors are contained in § 63.365.</i>
63.8(c)(7)(i)(A)-(B)	No	<i>Performance specifications for gas chromatographs and temperature monitors are contained in § 63.365.</i>
63.8(c)(7)(i)(C)	No	Opacity monitors are not required for these standards.
63.8(c)(7)(ii)	No	<i>Performance specifications for gas chromatographs and temperature monitors are contained in § 63.365.</i>
63.8(c)(8)	No	
63.8(d)	Yes	
63.8(e)(1)	Yes	
63.8(e)(2)	Yes	
63.8(e)(3)	Yes	
63.8(e)(4)	Yes	
63.8(e)(5)(i)	Yes	
63.8(e)(5)(ii)	No	Opacity monitors are not required for these standards.
63.8(f)(1)-(5)	Yes	
63.8(f)(6)	No	
63.8(g)(1)	Yes	
63.8(g)(2)	No	
63.8(g)(3)-(5)	Yes	
63.9(a)	Yes	
63.9(b)(1)(i)	Yes	
63.9(b)(1)(ii)-(iii)	No	<i>§ 63.366(c)(1)(i) contains language for sources that increase usage such that the source becomes subject to the emissions standards.</i>
63.9(b)(2)-(3)	Yes	<i>§ 63.366(c)(3) contains additional information to be included in the initial report for existing and new sources.</i>
63.9(b)(4)-(5)	No	<i>§ 63.366(c)(1)(ii) and (iii) contains requirements for new or reconstructed sources subject to the emissions standards.</i>
63.9(c)	Yes	
63.9(d)	No	
63.9(e)	Yes	

Reference	Applicability	Comment
63.9(f)	No	Opacity monitors are not required for these standards.
63.9(g)(1)	Yes	
63.9(g)(2)-(3)	No	Opacity monitors and relative accuracy testing are not required for these standards.
63.9(h)(1)-(3)	Yes	
63.9(h)(4)	No	Reserved
63.9(h)(5)	No	<i>§ 63.366(c)(2) instructs sources to submit actual data.</i>
63.9(h)(6)	Yes	
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	
63.10(b)(1)	Yes	
63.10(b)(2)(i)	No	Not applicable due to batch nature of the industry.
63.10(b)(2)(ii)	Yes	
63.10(b)(2)(iii)	No	
63.10(b)(2)(iv)-(v)	No	A startup, shutdown, and malfunction plan is not required for these standards.
63.10(b)(2)(vi)-(xiv)	Yes	
63.10(b)(2)(xiii)	No	
63.10(b)(2)(xiv)	Yes	
63.10(b)(3)	No	<i>§ 63.367(b) and (c) contains applicability determination requirements.</i>
63.10(c)(1)	Yes	
63.10(c)(2)-(4)	No	Reserved
63.10(c)(5)	Yes	
63.10(c)(6)	No	
63.10(c)(7)	No	Not applicable due to batch nature of the industry.
63.10(c)(8)	Yes	
63.10(c)(9)	No	Reserved
63.10(c)(10)-(13)	Yes	
63.10(c)(14)	Yes	
63.10(c)(15)	No	A startup, shutdown, and malfunction plan is not required for these standards.
63.10(d)(1)	Yes	
63.10(d)(2)	Yes	
63.10(d)(3)	No	Subpart O does not contain opacity or visible emissions standards.
63.10(d)(4)	Yes	
63.10(d)(5)	No	A startup, shutdown, and malfunction plan is not required for these standards.
63.10(e)(1)	Yes	
63.10(e)(2)(i)	Yes	
63.10(e)(2)(ii)	No	Opacity monitors are not required for these standards.

Reference	Applicability	Comment
63.10(e)(3)(i)-(iv)	Yes	
63.10(e)(3)(v)	No	<i>§ 63.366(a)(3) specifies contents and submittal dates for excess emissions and monitoring system performance reports.</i>
63.10(e)(3)(vi)-(viii)	Yes	
63.10(e)(4)	No	Opacity monitors are not required for these standards.
63.10(f)	Yes	
63.11	Yes	
63.12-63.15	Yes	

APPENDIX C

Table 2. 40 CFR, Part 63, Subpart O applicability to Baxter Healthcare Corporation.

Reference	Applicability	Comment
§ 63.360(a)	Yes	
§ 63.360(b)-(e)	No	
§ 63.360(f)	Yes	
§ 63.360(g)(1)	Yes	
§ 63.360(g)(2)-(3)	No	
§ 63.361	Yes	When overlap between subparts A and O occurs, subpart O takes precedence.
§ 63.362(a)-(d)	Yes	
§ 63.362(e)(1)	Yes	
§ 63.362(e)(2)	No	
§ 63.363(a)(1)-(2)	Yes	
§ 63.363(b)(1)(i)	Yes	The facility is going to continue to use the acid-water scrubber to control emissions from sterilization chamber vents.
§ 63.363(b)(1)(ii)	No	
§ 63.363(b)(2)(i)	Yes	The facility is going to continue to use the acid-water scrubber to control emissions from sterilization chamber vents.
§ 63.363(b)(2)(ii)	No	
§ 63.363(c)(1)-(2)	Yes	
§ 63.363(c)(3)(i)	No	
§ 63.363(c)(3)(ii)	Yes	
§ 63.363(d)(1)	Yes	
§ 63.363(d)(2)	No	
§ 63.363(e)-(f)	No	
§ 63.364(a)(1)-(2)	Yes	
§ 63.364(b)(1)	No	
§ 63.364(b)(2)	Yes	The facility is going to continue to use the acid-water scrubber to control emissions from sterilization chamber vents.
§ 63.364(c)(1)	No	
§ 63.364(c)(2),(4)	Yes	
§ 63.364(c)(3)	No	
§ 63.364(d)	No	
§ 63.364(e)	No	
§ 63.364 (f)	Yes	
§ 63.365(a)-(c)	Yes	
§ 63.365 (d)(1)	Yes	
§ 63.365(d)(2)	No	
§ 63.365(e)(1)	No	
§ 63.365(e)(2)	Yes	The facility is going to continue to use the acid-water scrubber to control emissions from sterilization chamber vents.
§ 63.365(f)(1)	No	
§ 63.365(f)(2)	Yes	

Reference	Applicability	Comment
§ 63.365(f)(3)	No	
§ 63.365(g)	No	
§ 63.365(h)	No	
§ 63.366(a)-(c)	Yes	
§ 63.367(a)	Yes	
§ 63.367(b)-(c)	No	

APPENDIX D

APPENDIX E

Table 1. 40 CFR 60, Subpart Dc applicability to Baxter Healthcare Corporation

Reference	Applicability	Comment
§ 60.40c	Yes	
§ 60.41c	Yes	
§ 60.42c(a)-(c)	No	
§ 60.42c(d)	Yes	
§ 60.42c(e)-(g).	No	
§ 60.42c(h)(1)	Yes	
§ 60.42c(h)(2)-(3)	No	
§ 60.42c(i)-(j)	Yes	
§ 60.43c(a)-(b)	No	
§ 60.43c(c)-(d)	Yes	
§ 60.44c(a)-(g)	No	
§ 60.44c(h)	Yes	
§ 60.44c(i)-(j)	No	
§ 60.45c(a)(1)-(6)	No	
§ 60.45c(a)(7)	Yes	
§ 60.45c(b)	No	
§ 60.46c(a)-(d)	No	
§ 60.46c(e)	Yes	
§ 60.46c(f)	No	
§ 60.47c(a)-(b)	No	
§ 60.48c(a)-(b)	Yes	
§ 60.48c(c)	No	
§ 60.48c(d)	Yes	
§ 60.48c(e)(1)-(2)	Yes	
§ 60.48c(e)(3)-(10)	No	
§ 60.48c(e)(11)	Yes	
§ 60.48c(f)(1)	Yes	
§ 60.48c(f)(2)-(3)	No	
§ 60.48c(g)	Yes	
§ 60.48c(h)	No	
§ 60.48c(i)	Yes	