

RESPONSE TO COMMENTS

BAXTER HEALTHCARE CORPORATION PERMIT #0544-AR-11 AFIN: 03-00002

The Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. A written comment on the draft permitting decision was submitted on behalf of the facility. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Comment #1: The permittee requested that the permit specific condition #60 include clarification indicating that opacity observations for the emergency generator are only required for use exceeding 24 hours

Response to Comment #1: *The opacity requirement will not appear in the final permit due to the facility being permitted as a minor source.*

ADEQ

ARKANSAS
Department of Environmental Quality

March 14, 2013

Carolyn Walker
Environmental Representative
Baxter Healthcare Corporation
1900 Highway, 201 North
Mountain Home, AR 72653

Dear Ms. Walker:

The enclosed Permit No. 0544-AR-11 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 11/5/2012.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0544-AR-11 for the construction, operation and maintenance of an air pollution control system for Baxter Healthcare Corporation to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

Enclosure

ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 0544-AR-11

IS ISSUED TO:

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

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

March 14, 2013

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Baxter Healthcare Corporation

AFIN: 03-00002

PERMIT NUMBER: 0544-AR-11

FACILITY ADDRESS: 1900 Highway, 201 North
Mountain Home, AR 72653

MAILING ADDRESS: 1900 Highway, 201 North
Mountain Home, AR 72653

COUNTY: Baxter County

CONTACT NAME: Carolyn Walker

CONTACT POSITION: Environmental Representative

TELEPHONE NUMBER: 870-424-5336

REVIEWING ENGINEER: Ambrosia Brown

UTM North South (Y): Zone 15: 4023856.66 m

UTM East West (X): Zone 15: 554981.31 m

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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. This permitting action is necessary to:

- The removal of the emergency generator currently listed as an insignificant activity
- The addition of a Diesel Emergency Generator as Source #112
- The addition of a Diesel Sub-base Storage tank as Source #113
- The addition of a transfer tank as an insignificant activity

Permitted annual emissions increases from this modification are by 0.1 tpy PM/ PM₁₀, 0.2 tpy SO₂, 0.2 tpy CO, and 0.4 tpy NO_x.

Process Description

Baxter manufactures peritoneal dialysis disposables, blood cell separation disposables, patient connectors and produces plastics for the disposables manufacturing. Most of the manufactured products are sterilized at the facility using ethylene oxide (EtO) (SN-11 through SN-15, SN-57, SN-76 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. Vacuum pumps pull a partial vacuum on the chamber. 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 (SN-101). The ethylene oxide is converted to ethylene glycol and stored in an 8,000 gallon storage tank (SN-88).

Steam ejectors, located at the Sterilization Chamber Exhaust vents (SN-11 through SN-15 and SN-57) are used as an alternative method for pulling a partial vacuum on the chamber when ethylene oxide is not present. This action results in zero emissions at all times.

In case of scrubber malfunction, Sterilization Chamber Rear Exhaust vents (SN-78 through SN-83) could be exhausted to the atmosphere. This would be used for an emergency that could impact personnel safety.

Manual and Automated Assembly

In manual and automated assembly, plastic parts are assembled to one another to produce sets, cassettes and many other products. Plastic parts that are assembled to produce medical devices include tubing, valves, housings, roller clamps, slide clamps, membranes, luer connectors, luer locks, spikes, needle adapters, filters, couplers, Y-connectors and others. Assembly for non-

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medical device products may involve a wide variety of plastic parts. Plastic parts are affixed or bonded to another using one of several techniques, including solvent bonding, ultrasonic bonding, ultraviolet (UV) energy, radio frequency (RF) energy, thermal energy, laser, friction or others. In the case of solvent bonding, a variety of solvents can be used including both HAPs and non-HAPs.

Compounding/Pelletizing and Film/Tubing Extrusion

At SN-95, raw materials are received in 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, tubing extrusion area, pelletizing area, or exported to other locations for processing. Small amounts of miscellaneous uncontrolled VOCs may result from the above described operations. The pollutant of concern is bis(2-ethylhexyl)phthalate (DEHP), a listed HAP. Uncontrolled DEHP emissions are captured with ventilation equipment from pelletizing, tubing extrusion, and film extrusion processes and routed to filters. Filters used in the plastics manufacturing 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 uncontrolled. Also included in SN-95 are emissions from inside DEHP storage tanks. Also included: Jet Cleaner (SN-72) 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 the polymer that 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). SN-89, SN-90 DEHP Storage Tanks are located outside in the plastics tank farm.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective November 18, 2012
40 CFR Part 63 Subpart O — Ethylene Oxide Emission Standards for Sterilization Facilities
40 CFR Part 63 Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories. General Provisions.
40 CFR Part 60 Subpart Dc — Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 63 Subpart ZZZZ — National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR Part 60, Subpart IIII — Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

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Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	1.8	3.1
PM ₁₀	1.8	3.1
SO ₂	43.2	30.7
VOC	100.0	95.0
CO	8.0	13.3
NO _x	13.7	16.5
Ethylene Oxide (EtO)*	0.91	0.70
Ethylene Glycol*	1.00	0.05
Individual HAP		9.5
Total Combined HAPs		23.75

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

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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, the 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: 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

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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 uncontrolled emissions (SN-95 through SN-97);
- Fuel oil tank (SN-100) that was not previously permitted; and
- The addition of an 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;

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- 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 Alternative Operating Scenario #1 and related conditions.

Permit # 544-AOP-R3 was a minor modification issued on November 12, 2003 to allow Baxter an alternative evacuation process for the EtO Sterilization Chambers. This alternative evacuation method allowed 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 did not change any permitted emission limits.

Permit # 544-AOP-R4 was the first Title V Renewal issued on January 5, 2005. With this renewal the Syntra plus Dialyzer sources (SN-104 and related insignificant activities), the CF repair station (SN-07), the Paint Booth (SN-44), and the pallet treatment process (SN-93 and SN-99) were removed from the permit because the facility has removed these sources from service. In addition several emission limits and conditions were updated based on current emission

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factors, equipment capacity limitations, historical usage records, and to fit the Department's currently accepted permitting format. Overall annual permitted emissions increased 0.46 tons Methylene chloride and less than 0.01 tons for each of the following hazardous air pollutants: cumene, dibutyl phthalate, chromium compounds, nickel compounds and xylene. All other permitted annual emissions decreased with this renewal.

Permit # 544-AOP-R5 was issued 5/12/2006. This significant modification included the following changes:

- Annual and short-term plant-wide VOC and HAP emissions caps replaced source-specific VOC and HAP emission rate requirements and related production and throughput limits. The rolling twelve-month VOC cap was set at 95 tons per year (tpy); the HAP cap was set at 23.75 tpy (for aggregated HAPs) and 9.5 tpy (for individual HAPs).
- The permittee was authorized to move existing equipment to different locations within the facility, modify existing equipment, add new equipment, or change raw materials (including solvents) provided that these changes are made in compliance with the HAP screening matrix limits, plant-wide HAP and VOC limits, and other applicable requirements.
- The permittee was authorized to install, move, and modify other equipment or processes not listed in Appendix A of the permit, provided that the installation, move, or modification does not trigger any new applicable federal or state regulatory requirements that are not already addressed in the permit and provided that the installation, move, or modification passes the HAP screening matrix review and that the plant is able to maintain emissions below the plant-wide VOC and HAP limits.
- Installation of new equipment including boilers, ethylene oxide sterilizers, and a plastics grinder.
- Various scenarios were approved regarding new ethylene oxide sterilization units.
- Movement of needles grinding to insignificant activities.
- Removal of sources from the permit which are no longer in service at the facility.

Overall annual permitted emissions decreased 12.7 tons of VOC and increased 2.6 tons of PM, 15.2 tons SO₂, 3 tons of CO, 11 tons of NO_x, and 15.7 tons total combined HAPs.

Permit # 544-AOP-R6 was issued March 23, 1979. This permit modification allows the addition of a scrubber to the ethylene oxide sterilization system.

Permit # 544-AOP-R7 was issued February 15 1994. The permit modification allowed the installation of high intensity plastics blend system.

Permit # 544-AOP-R8 was issued June 30, 1995. The permit modification upgraded the pressure relief protection of the chillers in the boiler room including the addition of SN-67, SN-68, and SN-69.

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Permit # 544-AOP-R9 was issued September 18, 1996. The permit modification added source SN-91 (Pallet Treatment Process). Permitted emissions were increased by 0.1 tpy PM, 0.1 tpy SO₂, 0.1 tpy VOC, 0.1 tpy CO, and 0.1 tpy NO_x.

Permit # 544-AOP-R10 was issued August 30, 2010. The facility no longer met the criteria of Title V. This permitting action is necessary to:

- Issue a Minor Source Permit.
- Remove the following sources from the permit:
 - The Needles Grinding Operation (SN-21 through SN-28, SN-45, and SN-98) because the equipment has been removed
 - Methylene Chloride Etching (SN-102) and E-Beam ionizing Radiation (SN-103) because the equipment is no longer in service
 - The Lasker Boiler (SN-16) because it has been replaced with a new boiler
 - Plastics Grinder #2 (SN-73) because it was not installed
 - Sterilization Chambers 110 and 111 because they were not installed
- Install a new Cleaver Brooks Boiler (SN-18) per the terms of 0544-AOP-R5 as a replacement for SN-16.
- Remove as Source Numbers, the following Insignificant Activities:
 - Resin Storage Silos (former SN-59 through SN-66)
 - Water Chillers (former SN-67 through SN-69)
 - Print Shop (former SN-85)
 - Molding Process (former SN-96)
 - Coextruded Non-PVC Plastics (former SN-107)
 - Pump Housing and Sets Assembly (former SN-108)
- Remove the following insignificant activities: (1) nitric acid tanks; (2) citric acid tanks; (3) sodium hydroxide tanks; (4) needles silicone; (5) needles cleaning/electroplating; (6) needles neutralization tank; (7) Isolex 300 Sets (former SN-87).

Permitted annual emissions change as follows from this activity: CO increases by 3.6 tpy; PM, and PM₁₀ decrease by 4.5 tpy each; SO₂, VOC, and NO_x decrease by 12.7 tpy, 0.6 tpy, and 18.9 tpy, respectively.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19 §19.501 et seq. and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
09	Filter Integrity Test Station Exhaust	Included in Plantwide VOC limit ¹		
11-15, 57	Sterilization Chamber Air Evacuation Exhaust	Emissions routed to SN-101 ²		
17	42 MMBtu/hr Babcock & Wilcox Boiler	PM ₁₀	0.6	0.6
		SO ₂	21.3	15.2
		VOC	0.3	0.5
		CO	3.6	6.3
		NO _x	6.0	7.5
18	24 MMBtu/hr Cleaver Brook Boiler	PM ₁₀	0.6	0.6
		SO ₂	21.3	15.2
		VOC	0.3	0.5
		CO	3.6	6.3
		NO _x	6.0	7.5
41	Plastics Grinding Process	PM ₁₀	0.4	1.7
57	Sterilization Chamber Air Evacuation Exhaust	Routed to SN-101 ¹		
76 & 77	Aeration Rooms 3&4	Routed to SN-94 ²		
78-81	(4) 150 lb Sterilization Chamber Rear Exhaust	Routed to SN-101 ²		
82,83	(2) 200 lb Sterilization Chamber Rear Exhaust	Routed to SN-101 ²		

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SN	Description	Pollutant	lb/hr	tpy
88	Ethylene Glycol Tanks	VOC	1.0	0.1
94	Sterilization Catalytic Oxidizer	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.4
		CO	0.1	0.5
		NO _x	0.3	1.1
100	Fuel #2 Storage Tank	VOC	6.0	0.1
101	Ethylene Oxide Absorber Tower	VOC	0.9	0.4
112	237 HP Diesel Emergency Generator	PM ₁₀	0.1	0.1
		SO ₂	0.5	0.2
		VOC	0.1	0.1
		CO	0.7	0.2
		NO _x	1.4	0.4
113	Diesel Sub-base Storage tank	VOC	0.1	0.1

¹ Plantwide VOC limited to 100 lb/hr and 95.0 tpy

² VOC (Ethylene oxide) may be emitted to atmosphere only as a result of emergency or upset conditions.

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
11-15, 57	Sterilization Chamber Air Evacuation Exhaust	Emissions routed to SN-101 ¹		
17	42 MMBTU/HR Babcock & Wilcox Boiler	PM	0.6	0.6
18	24 MMBTU/HR Cleaver Brook Boiler	PM	0.6	0.6
41	Plastics Grinding Process	PM	0.4	1.7

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SN	Description	Pollutant	lb/hr	tpy
72	Jet Cleaner	See Plantwide HAP limit ²		
76 & 77	Aeration Rooms 3&4	Emissions routed to SN-94		
78-81	(4) 150 lb Sterilization Chamber Rear Exhaust	Emissions routed to SN-101		
82 & 83	(2) 200 lb Sterilization Chamber Rear Exhaust	Emissions routed to SN-101		
88	Ethylene Glycol Tanks	Ethylene Glycol	1.00	0.05
89	DEHP Storage Tank	See Plantwide HAP limit ²		
90	DEHP Storage Tank	See Plantwide HAP limit ²		
94	Sterilization Catalytic Oxidizer	PM	0.1	0.1
		Ethylene Oxide	0.07	0.30
101	Ethylene Oxide Absorber Tower	Ethylene Oxide	0.84	0.40
112	237 HP Diesel Emergency Generator	PM	0.1	0.1

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

² Plantwide HAP limited to 9.5 tpy of any individual HAP and 23.75 tpy any combination of HAP emissions

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
17, 18 (Natural Gas Fuel)	5%	§18.501 and A.C.A.
17, 18 (Fuel Oil Fuel)	20%	§19.503 and A.C.A.
41	5%	§18.501 and A.C.A.
94 & 112	20%	§19.503 and A.C.A.

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4. The permittee shall not exceed the plantwide emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #5. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
VOC	100	95.0

5. The permittee shall maintain records of VOC emissions that demonstrate compliance with the limits set in Specific Condition #4 and may be used by the Department for enforcement purposes. The emissions shall be calculated according to the following formula: [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

$$\text{VOC emissions} = \text{VOC usage} - \text{VOC waste collected}$$

The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

6. 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. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee is authorized to add new equipment, modify existing and new equipment, move existing and new equipment to different locations within the facility, and change raw materials (including solvents) without further approval provided the following conditions are met [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]:
- a) Equipment must be within the categories listed in Appendix A or, for equipment not listed in Appendix A, the installation and use of such equipment must not change the fundamental nature of the business. This condition does not authorize the addition of new boilers, ethylene oxide sterilization chambers, or plastics grinders which are addressed elsewhere.
 - b) Total facility-wide VOC and HAP emissions from existing, new, and modified equipment must continue to comply with the Plant-wide VOC Caps in Specific Condition #4 and Specific Condition #5.
 - c) Total facility-wide emissions of any HAP from existing, new and modified equipment must continue to comply with the Facility-wide HAPs limits in Specific Condition #9.
 - d) The addition, modification, or relocation of equipment shall not cause any new requirement, not already included in this permit, to become applicable to any emission unit at the facility.

- e) The addition, modification, or relocation of equipment shall not impact the ability to demonstrate compliance with the Plant-wide VOC and HAP Caps and Facility-wide HAP limits using a mass balance approach. Mass balance calculations shall be adjusted to reflect all new raw materials and changes to raw materials associated with any existing, new, modified, or relocated equipment.
- 8. The permittee shall maintain on-site records of all changes made pursuant to Specific Condition #7, including but not limited to, the date on which construction and/or modification of any equipment began, the date that operation of any new and/or modified equipment began and the date that any new raw materials were introduced or change in raw materials was made. The permittee shall include a source description for any new or modified source, the updated location of the source (including an updated plot plan), and the type of emissions resulting from the new/modified source. The permittee shall maintain on-site records of equipment removed from installation and the date on which it was removed. The on-site records shall be available for review by the permitting authority at any time. [Regulation No. 19 §19.705, Regulation No. 18 §18.1004, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 9. The permittee shall not exceed the plantwide emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #10. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Individual HAP	*	9.5
Total Combined HAPs	*	23.75

* The hourly emissions must comply with Specific Condition 11.

- 10. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition #9 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. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 11. The permittee may substitute or introduce new HAP containing materials to the facility provided that the materials are compliant with the facility-wide HAP content limits set forth in the following table and the annual HAP emissions do not exceed 23.75 tpy for combined HAPs and 9.5 tpy for an individual HAP. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]:

Table 3: Facility-wide Hazardous Air Pollution Limits		
Minimum TLV (mg/m ³)	PAIL** (µg/m ³)	Maximum Rate (lb/hr)
0.1	1	0.01
0.5	5	0.04
1	10	0.09
10	100	0.94
20	200	1.89
30	300	2.83
40	400	3.77
50	500	4.72
75	750	7.08
100	1000	9.43
150	1500	14.15
200	2000	18.87
250	2500	23.58
300	3000	28.30
350	3500	33.02
400	4000	37.74
450	4500	42.45
500	5000	47.17

* Ethylene Oxide is not covered under the limits of this table but is covered by other specific conditions.

** PAIL is equal to 1/100th of the TLV.

12. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition #11 [i.e., the HAP matrix], and that may be used by the Department for enforcement purposes. Compliance shall be determined by inspecting the ACGIH Threshold Limit Values (TLVs) as listed on current MSDS, or in the most recently published ACGIH handbook of TLVs and Biological Exposure Indices (BEIs) and properly noting on the monthly HAP records whether the material in question is compliant with the table contained in Specific Condition #11. The hourly maximum usage rate shall be demonstrated by keeping mass balances on record on a monthly basis of all HAP containing materials in use that qualify under Specific Condition #11. All records shall be maintained on site and shall be provided to the Department upon request.

In the case where keeping a new mass balance is not feasible or relevant, the permittee shall propose a recordkeeping scheme to the Department for review and approval in writing from the Department. The permittee shall secure the approval for the new recordkeeping scheme prior to utilizing the proposed scheme. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

13. The permittee is authorized to add new equipment, modify existing and new equipment, move existing and new equipment to different locations within the facility, and change raw materials (including solvents) without further approval provided the following conditions are met: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a) Equipment must be within the categories listed in Appendix A or, for equipment not listed in Appendix A, the installation and use of such equipment must not change the fundamental nature of the business. This condition does not authorize the addition of new boilers, ethylene oxide sterilization chambers, or plastics grinders which are addressed elsewhere.
 - b) Total facility-wide VOC and HAP emissions from existing, new, and modified equipment must continue to comply with the Plant-wide VOC Caps in Specific Condition #4 and Specific Condition #9.
 - c) Total facility-wide emissions of any HAP from existing, new and modified equipment must continue to comply with the Facility-wide HAP limits in Specific Condition #9.
 - d) The addition, modification, or relocation of equipment shall not cause any new requirement, not already included in this permit, to become applicable to any emission unit at the facility.
 - e) The addition, modification, or relocation of equipment shall not impact the ability to demonstrate compliance with the Plant-wide VOC and HAP Caps and Facility-wide HAP limits using a mass balance approach. Mass balance calculations shall be adjusted to reflect all new raw materials and changes to raw materials associated with any existing, new, modified, or relocated equipment.
14. The permittee shall maintain on-site records of all changes made pursuant to Specific Condition #13, including but not limited to, the date on which construction and/or modification of any equipment began, the date that operation of any new and/or modified equipment began and the date that any new raw materials were introduced or change in raw materials was made. The permittee shall include a source description for any new or modified source, the updated location of the source (including an updated plot plan), and the type of emissions resulting from the new/modified source. The permittee shall maintain on-site records of equipment removed from installation and the date on which it was removed. The on-site records shall be available for review by the permitting authority at any time. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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16. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18 §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Sterilization Process Conditions

17. The permittee shall not exceed a usage of 400,000 pounds of ethylene oxide at the sterilization chambers for any rolling twelve (12) month period. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee shall maintain records that demonstrate compliance with the limit set in Specific Condition # **Error! Reference source not found.** 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. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
19. 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 during any rolling twelve (12) month period. Applicable provisions of Subpart O are included, but are not limited to, in specific conditions listed below. [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]
20. 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 of Subpart O. [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]
21. The permittee shall comply with the provisions of Subpart O according to the applicability of the emissions standards to the facility in Subpart O. [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]
22. 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. [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]
23. 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 of Subpart O. This test was conducted on May 22-23, 2000. [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]
24. During the performance test required in Specific Condition #23, the permittee shall determine the concentration of ethylene oxide emitted from the aeration room into the

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atmosphere after the catalytic oxidizer (SN-94) using the methods in §63.365(c)(1) of 40 CFR 63, Subpart O. [40 CFR 63.363(c)(1)(i) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

25. During the performance test required in Specific Condition #23, 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. [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]
26. The permittee shall install, calibrate, operate, and maintain a temperature monitor accurate to within ± 5.6 °C (± 10 °F) to measure the oxidation temperature. [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]
27. The permittee shall not operate the facility with the oxidation temperature, averaged over three hours, more than 5.6 °C (10 °F) below the baseline oxidation temperature (effective May 24, 2000). [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]
28. 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. [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]
29. 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 40 CFR 63.365(d)(1). The permittee determined the baseline temperature to be 325°F. [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]
30. 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. [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]
31. The permittee shall operate an acid-water scrubber (SN-101) to reduce emissions to the atmosphere from the vacuum pumps and the sterilization chamber rear exhaust vents (SN-78 through SN-83). [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]

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32. The permittee shall conduct an initial 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 of Subpart O the procedures listed in §63.363(b), and the test methods listed in §63.365(b)(1) of Subpart O. The facility shall also establish the maximum scrubber tank level as an operating parameter using the procedures described in 63.365(e). (performance test conducted May 22-23, 2000) [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]
33. Operation of the facility with the SN-101 liquor tank level in excess of the maximum liquor tank level, 18ft, shall constitute a violation of the sterilization chamber vent standard. [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]
34. The permittee shall 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). The owner or operator shall install, maintain, and use a liquor level indicator to measure the scrubber liquor tank level. [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]
35. The permittee shall monitor the control device to which emissions from the rear chamber exhaust are manifolded using requirements in §63.364(b). [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]
36. The permittee shall comply with the recordkeeping requirements in §63.10(b) and (c) of Subpart A, according to the applicability in Table 1. [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]
37. 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. [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]
38. 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. [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]
39. 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 37. [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]

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40. 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 venting directly to the atmosphere, the permittee does not have to report to the Department. [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]
41. 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 the aeration room is vented directly to the atmosphere for a period exceeding one (1) hour, the permittee shall report such actions to the Department in accordance with General Condition #10 of this permit. [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]
42. 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 §18.2 of Regulation 18 and shall state all actions taken during a startup, shutdown, and malfunction of SN-94 (including actions taken to correct a malfunction). [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]

SN-17, SN-18, & SN-100 Conditions

43. The permittee shall use only No.2 fuel oil that contains 0.5% or less sulfur by weight or ultra low sulfur diesel (ULSD) as a back-up fuel in the boilers (SN-17 & SN-18). [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
44. The permittee shall maintain documentation from the fuel supplier that demonstrates compliance with the limits set in Specific Condition #43 and may be used by the Department for enforcement purposes. Fuel supplier certification for No.2 oil fuel shall include the name of the oil supplier, 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, and the sulfur content or maximum sulfur content of the oil. The certifications shall be kept on site, and shall be provided to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
45. The permittee shall not exceed a natural gas usage throughput of 300,000,000 cubic feet for any rolling twelve (12) month period. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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46. The permittee shall not exceed a No.2 fuel oil throughput of 725,000 gallons for any rolling twelve (12) month period. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
47. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition #45 and Specific Condition #46. The records 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. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
48. The permittee shall not exceed 5% opacity from SN-17 and SN-18 while burning natural gas as measured by EPA Reference Method 9. Compliance shall be demonstrated by only burning natural gas. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
49. The permittee shall not exceed 20% opacity from SN-17 and SN-18 while burning No.2 fuel oil. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 50. [Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
50. In the event the permittee burns fuel oil for three (3) hours or more in any consecutive 24 hour period or a total of 14 hours or more in any rolling 12 month period in SN-17 or SN-18, the permittee shall conduct an EPA Reference Method 9, 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. [Regulation No. 19 §19.703 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
51. The permittee shall maintain records of the type of fuel burned in the boilers and opacity readings or observations (if required) that demonstrate compliance with the limits set in Specific Conditions #48 through #50. These records 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. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
52. The permittee shall perform initial stack testing of SN-17 and SN-18 for carbon monoxide (CO) and nitrogen oxides (NO_x) emissions while burning No. 2 fuel oil. The initial performance testing shall be performed no later than sixty (60) days after the permittee burns 72,500 gallons (10 percent of the permitted annual throughput) or more of No. 2 fuel oil for the first rolling 12 month period. Testing shall be performed in accordance with EPA Reference Methods 10 and 7E, respectively, as found in 40 CFR, Part 60, Appendix A. [Regulation No. 19 §19.702 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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53. Air contaminant emissions sampling and testing performed in Specific Condition #52 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. [Regulation No. 19 §19.702 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
54. SN-18 is subject to and shall comply with all applicable provisions of 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. [Regulation 19 §19.304 and 40 CFR 60.40c(a)]
55. Instead of the daily recordkeeping requirements of §60.48c(g), the permittee shall record and maintain records of the amount of fuel combusted at SN-18 during each month. This requirement has been modified in accordance with the February 9, 1999 letter from the Environmental Protection Agency (Control Number 9900046). The records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be maintained on-site and made available to Department personnel upon request. [Regulation 19 §19.304 and 40 CFR 60.48c(g)]
56. The records required by Specific Condition #55 shall be maintained by the permittee for a period of two years following the date of such record. [Regulation 19 §19.304 and 40 CFR 60.48c(i)]

SN-41 Conditions

57. The permittee was required to perform initial stack testing of SN-41 for PM emissions. Testing was required in accordance with EPA Reference Methods 1 through 5 as found in 40 CFR, Part 60, Appendix A. Testing was performed on December 8-9, 1999. [Regulation No. 19 §19.702 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
58. The permittee shall not grind more than 8,000 tons of waste plastic for any rolling twelve month period. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
59. The permittee shall maintain records that demonstrate compliance with Specific Condition #58 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. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-112 Conditions

60. The permittee shall not operate the emergency generator SN-112 more than 500 hours in any consecutive twelve month period. The generator shall have a non-resettable hour

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meter in order to verify compliance with this limit. The permittee shall maintain monthly and 12-month total records in order to demonstrate compliance with the limit and which may be used by the Department for enforcement purposes. These records shall be updated no later than the fifteenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.501 et seq. and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

61. Emergency Generator SN-112 is subject to the provisions of 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Stationary Reciprocating Internal Combustion Engines. Compliance with subpart ZZZZ shall be demonstrated through compliance with requirements of 40 CFR Part 60 Subpart IIII. [40 CFR §63.6585, §63.6590(c)(1) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
62. Emergency Generator SN-112 is subject to the provisions of 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The applicable provisions of this subpart include, but are not limited to, the items found in Specific Conditions #63 through #70. [40 CFR §60.4200(a)(1) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
63. The permittee shall install a non-resettable hour meter for the Emergency Generator SN-112 prior to startup of the engine. [40 CFR §60.4209 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
64. The permittee shall only purchase diesel fuel that meets the requirements of 40 CFR 80.510 for nonroad diesel fuel. Records of purchased fuel specifications are to be maintained on-site and made available to Department personnel upon request. [40 CFR §60.4207 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
65. The permittee shall purchase an engine certified to the emission standards in §60.4205(b) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in Specific Condition #69. [40 CFR §60.4211(c) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
66. The permittee shall operate and maintain the stationary CI internal combustion engine SN-112 and control device according to the manufacturer's emission-related written instructions. The permittee shall change only those emission-related settings that are permitted by the manufacturer. The permittee shall meet the requirements of 40 CFR parts 89, 94 and 1068, as applicable. The permittee shall maintain records of all maintenance and repairs completed on the emergency engine SN-112. These records shall be maintained on site and made available to Department personnel upon request. [40 CFR §60.4211(a) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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67. The permittee shall operate the emergency stationary ICE (SN-112) for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations by this subpart. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. Compliance shall be demonstrated through Specific Condition #68. [40 CFR §60.4211(a) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
68. The permittee shall maintain records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR §60.4214(b) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
69. The permittee shall maintain all manufacturer's emission-related written instructions. These documents shall be maintained on-site and made available to Department personnel upon request. If the permittee does not install, configure, operate, and maintain the emergency engine SN-112 and control device according to the manufacturer's emission-related written instructions, or change emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows: [40 CFR §60.4211(g) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a) The permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - b) The permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

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70. If a performance test is required by Specific Condition #69, the following testing requirements shall be met: [40 CFR §60.4212 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- a) The permittee shall conduct the performance test according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE
- b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.
- c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \quad (\text{Eq. 1})$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

- d) As an alternative to the procedures a) through c), stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in § 60.4213 of this subpart, as appropriate.
- e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated October 23, 2012.

Description	Category
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
Chiller Plant #3 (installed 2007)	Group A 1
Diesel Fuel 150 gal Transfer Tank	Group A 2
570 gal Diesel Fuel Tank	Group A 3
300 gal Diesel Fuel Tank	Group A 3
500 and 300 gal Propane Tanks	Group A 3
Maintenance Neutralization Tank	Group A 4
Needles Neutralization Tank	Group A 4
Salt Brine Tank	Group A 4
Distilled Water Tank	Group A 3
De-aeration Tank	Group A 3
R O Water Tank	Group A 4
5500 gal Out of Service Tank	Group A 3
Water	Group A 3
Air Receiver 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
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
Vikoflex Storage Tank	Group A 4
Hatcol Storage Tank	Group A 4
Vikoflex Storage Tank	Group A 4
Vikoflex Storage Tank	Group A 4
Empty Oil Tanks (Qty 2)	Group A 4
Scrap Oils Tank	Group A 4
Mixing Tank (Citroflex, Hatcol)	Group A 4
Hydraulic Oil Portable Inside Tanks (Qty 2)	Group A 4

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Description	Category
275 gal Totes Gear Oil	Group A 4
Hydraulic and Gear Oils	Group A.8
Laboratory Vents	Group A 5
30,000 gal Emergency Fuel Oil #2 Storage Tank (empty under normal conditions)	Group A 12
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
Vacuum Pumps – Plastics	Group A 13
Dust Collector (PE172) Home Choice	Group A 13
Molding Process (former SN-96)	Group A 13
Coextruded Non-PVC Plastics (SN-107)	Group A 13
Particulate Matter (PM) Removal Vacuum Systems	Group A 13
Thermoformer regrind convey air	Group A 13
Core Extrusion convey air	Group A 13
Non-146-2 Grinder (no emissions to atmosphere, filter air and exhaust to warehouse)	Group A 13
PVC Blend (4 inside tanks—uncontrolled)	Group A 13
1847 Blend (1 inside tank—uncontrolled)	Group A 13
146-2 Pellets (2 inside tanks—uncontrolled)	Group A 13
Home Hemo Dialysis Assembly/Bicarbonate Tubing Set	Group A 13
Print Shop (SN-85)	Group A 13
Pump Housing (Sets) (former SN-108)	Group A 13
Label Printing Inks	Group A 13

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Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that 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 that 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. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19 §19.704 and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19 §19.410(B) and/or Regulation 18 §18.309(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor

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5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) calendar days after the completion of testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19 §19.303 and/or Regulation 18 §18.1104 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19 §19.601 and/or Regulation 18 §18.1101 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19 §19.410(A) and/or Regulation 18 §18.309(A) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19 §19.407(B) and/or Regulation 18 §18.307(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18 §18.314(A), Regulation 19 §19.416(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18 §18.314(B), Regulation 19 §19.416(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

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21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
 - a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18 §18.314(C), Regulation 19 §19.416(C), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to
Baxter Healthcare Corporation, 1900 Highway, 201 North, Mountain Home, AR, 72653, on this
14th day of March 2013.

Pam Owen

Pam Owen, AAIL, Air Division