



STATE OF DELAWARE

DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL

DIVISION OF AIR QUALITY
STATE STREET COMMONS
100 W. WATER STREET, SUITE 6A
DOVER, DELAWARE 19904

ENGINEERING &
COMPLIANCE

PHONE
(302) 739-9402

February 25, 2021

**Draft Permit: APC-2018/0060-CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)
Catalytic Oxidizers (CATOX1 & CATOX2), Coating Lines 1 thru 4, and Associated Dust
Collectors 1 thru 4, and Mix Station Dust Collector**

Datwyler Pharma Packaging USA, Inc.
Catalytic Oxidizer (CATOX)
571 Merrimac Avenue
Middletown, Delaware 19709

ATTENTION: Frank Schoubben
Project Manager

Dear Mr. Schoubben:

SUBJECT: Datwyler Pharma Packaging USA, Inc. Draft Synthetic Minor Permit

Dear Mr. Schoubben:

Enclosed is a copy of Synthetic Minor **Draft Permit: APC-2018/0060- CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)** that was sent to EPA for review. The Draft Permit will also be advertised for public comment on Sunday, February 28, 2021 in the Sunday News Journal and the Delaware State News. Please note that the public comment period ends Monday, March 29, 2021. Please make any comments before this date.

Prior to the issuance of the Final Synthetic Minor **Permit: APC-2018/0060 - CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)**, Datwyler Pharma Packaging USA, Inc. shall contact the Department to arrange a construction to operation inspection. Upon a satisfactory demonstration by the on-site inspection that the equipment or process complies with all of the terms and conditions of the above mentioned permit, the Department shall issue a Final Approval to operate under 7 **DE Admin. Code** 1102.

Please note that, the provisions of 7 **DE Admin. Code** 1102 Sections 2.1 and 11.3 shall not apply to the operation of equipment or processes for the purposes of initially demonstrating satisfactory performance to the Department following construction, installation, modification, or alteration of the equipment or processes.

**DRAFT Permit: APC-2018/0060-CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)
Catalytic Oxidizers (CATOX1 & CATOX2), Coating Lines 1 thru 4, and Associated Dust
Collectors 1 thru 4, and Mix Station Dust Collector
Datwyler Pharma Packaging USA, Inc.
Middletown, Delaware
February 25, 2021
Page 2**

If you have any questions, I can be reached at (302) 323-4542.

Sincerely,



Bradley A. Klotz
Environmental Engineer
Engineering & Compliance Branch

ADM:KAM:BAK:bak
F:\EngAndCompliance\BAK\bak21023

pc: Dover File\Angela D. Marconi, P.E.\ Karen A. Mattio, P.E.\Lou Sierra, Jr., Sr. Process Engineer – Datwyler (*sent via email*)



DNREC – Division of Air Quality

LEGAL NOTICE

TITLE V SYNTHETIC MINOR PERMIT APPLICATIONS

Notice is hereby given that Datwyler Pharma Packaging USA, Inc. has submitted an application, pursuant to 7 **DE Admin. Code** 1102, Section 2.1, 11.2.9, and 12.3 for a permit amendment to construct two (2) additional coating lines with an associated Catalytic Oxidizer, and two (2) coating line dust collectors at their 571 Merrimac Avenue, Middletown, Delaware facility.

Datwyler Pharma Packaging USA, Inc. requests to limit the hours of operation to 6000 hours per year. These limits with the operation of the Catalytic Oxidizers are necessary to restrict Datwyler Pharma Packaging USA, Inc.'s potential to emit air pollutants, and the limit will be enforceable by the EPA and the state. Total estimated emissions from the facility are 0.622 lb/hr and 0.648 ton/year Volatile Organic Compounds (VOCs), 0.61 lb/hr and 0.61 ton/year Total Hazardous Air Pollutants (HAPs), 4.89 lb/hr and 4.89 tons/year Acetone, 0.234 lb/hr and 0.702 ton/year Nitrogen Oxide (NO_x), 0.0014 lb/hr and 0.004 ton/year Sulfur Dioxide (SO₂), 0.0763288 lb/hr and 0.115 ton/year Total Particulate Matter (PM), and 0.196 lb/hr and 0.590 ton/year Carbon Monoxide (CO).

The application, the "draft" permit (**APC: 2018/0060-CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)**), all materials that the applicant has submitted (other than those granted confidential treatment under DNREC rules), and a copy or summary of other materials, if any, considered in preparing the "draft" permit may be reviewed upon request. The application is posted at <https://de.gov/dnrecnotices>. To submit comments, for additional information or for information regarding how you can inspect the application, please contact Tracy Mattson at (302) 739-9402.

A public hearing concerning the permitting action will not be held unless the Secretary of the Department of Natural Resources and Environmental Control receives a request for such hearing within thirty (30) days from the date of this notice, ending March 29, 2021. A request for a hearing shall be in writing and must show a familiarity with the application and a reasoned statement of the permit's probable impact.

DIVISION OF AIR QUALITY
STATE STREET COMMONS
100 W. WATER STREET, SUITE 6A
DOVER, DE 19904
(302) 739-9402

Publication instructions:

Please publish in the DELAWARE STATE NEWS as a two-column display ad on the following date: **SUNDAY, February 28, 2021**

Invoice coding: 400402

Account No.: 119125

Please send affidavits with newspaper clippings to: **Tracy Mattson, Division of Air Quality, State Street Commons, 100 W. Water Street, Suite 6A, Dover, Delaware 19904.**

Publication instructions:

Please publish in the SUNDAY NEWS JOURNAL as a two-column display ad on the following date: **SUNDAY, February 28, 2021**

Invoice coding: 400402

Account No.: SD0111

Please send affidavits with newspaper clippings to: **Tracy Mattson, Division of Air Quality, State Street Commons, 100 W. Water Street, Suite 6A, Dover, Delaware 19904.**



STATE OF DELAWARE

**DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL**

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**ENGINEERING &
COMPLIANCE**

PHONE
(302) 739-9402

February 25, 2021

Draft Permit: APC-2018/0060-CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)

Datwyler Pharma Packaging USA, Inc.
571 Merrimac Avenue
Middletown, Delaware 19709

ATTENTION: Frank Schoubben
Project Manager

Dear Mr. Schoubben:

Pursuant to 7 **DE Admin. Code** 1102, Section 2, approval of the Department of Natural Resources and Environmental Control (the Department) is hereby granted for the construction of 1 (one) Standardkessel Baumgarte Catalytic Oxidizer (CATOX), Coating Lines 3 & 4, and 2 (two) Donaldson Model DFO2-8-R Dust Collectors located at the Datwyler Pharma Packaging USA, Inc. in Middletown, Delaware, in accordance with the application submitted on Form Nos. AQM-1 and AQM-2, AQM-3.1, AQM-4.1, AQM-4.6, and AQM-5 dated February 3, 2021 signed by Frank Schoubben, Plant Manager, under cover letter dated February 2, 2021.

This permit is issued subject to the following conditions all of which are federally enforceable except Condition 2.3 and 6.1:

1. General Provisions

- 1.1 This permit expires on **March xx, 2024**. If the equipment covered by this permit will not be constructed by **March xx, 2024** a request to extend this construction permit must be submitted by **January xx, 2024**.
- 1.2 Datwyler Pharma Packaging USA, Inc. agrees that all limits, restrictions and requirements in this permit are necessary to limit their potential to emit below major source thresholds. Violation of any limit, restriction or requirement contained herein may be grounds for

suspension or revocation of the permit or other enforcement action for noncompliance with the permit, the failure to apply for a Title V permit, or the failure to obtain a Title V permit.

- 1.3 The operational limitations of Conditions 2.1.1.5, 2.1.2.1, and 2.1.2.2 are voluntary restrictions to limit HAP emissions to below the five (5) ton per year applicability threshold of **7 DE Admin. Code** 1125, Section 4, *Minor New Source Review*. The owner and/or operator shall meet the control technology requirements of **7 DE Admin. Code** 1125, Section 4, *Minor New Source Review* if an increase in the operational limitations of Condition 3.1.1 that results in an increase in VOCs or HAPs potential to emit above five tons per year.
- 1.4 The project shall be constructed in accordance with the application described above. If any changes are necessary, revised plans must be submitted and supplemental approval issued prior to actual construction.
- 1.5 Representatives of the Department may, at any reasonable time, inspect this facility.
- 1.6 This permit may not be transferred to another location or to another piece of equipment or process.
- 1.7 This permit may not be transferred to another person, owner, or operator unless the transfer has been approved in advance by the Department. Approval (or disapproval) of the permit transfer will be provided by the Department in writing. A request for a permit transfer shall be received by the Department at least thirty days before the date of the requested permit transfer. This request shall include:
 - 1.7.1 Signed letters from each person stating the permit transfer is agreeable to each person; and
 - 1.7.2 An Applicant Background Information Questionnaire pursuant to 7 Del C, Chapter 79 if the person receiving the permit has not been issued any permits by the Department in the previous five (5) years.
- 1.8 The applicant shall, upon completion of the construction, installation, or alteration, request that the Department grant approval to operate.
 - 1.8.1 A separate application to operate pursuant to **7 DE Admin. Code** 1102 does not need to be submitted to the Department for the equipment or process covered by this construction permit. Upon a satisfactory demonstration by an on-site inspection that the equipment or process complies with all of the terms and conditions of this permit, the Department shall issue a **7 DE Admin. Code** 1102 Operating Permit for this equipment or process.
 - 1.8.2 The applicant shall notify the Department sufficiently in advance of the demonstration and shall obtain the Department's prior concurrence of the operating factors, time period, and other pertinent details relating to the demonstration.

- 1.8.3 The provisions of 7 **DE Admin. Code** 1102 Sections 2.1 and 11.3 shall not apply to the operation of equipment or processes for the purposes of initially demonstrating satisfactory performance to the Department following construction, installation, modification, or alteration of the equipment or processes.
- 1.9 The owner or operator shall not initiate construction, install, or alter any equipment or facility or air contaminant control device which will emit or prevent the emission of an air contaminant prior to submitting an application to the Department pursuant to 7 **DE Admin. Code** 1102, and, when applicable 7 **DE Admin. Code** 1125, and receiving approval of such application from the Department; except as exempted in 7 **DE Admin. Code** 1102 Section 2.2.

2. Emission Limitations

- 2.1 Air contaminant emission levels shall not exceed those specified in 7 **DE Admin. Code** 1102 and the following:
- 2.1.1 **Emission Point (CATOX1 & CATOX2) – Products of Combustion**
- 2.1.1.1 Nitrogen Oxide (NO_x) Emissions
NO_x emissions shall not exceed 0.234 pound per hour and 0.702 ton per twelve month rolling period;
- 2.1.1.2 Carbon Monoxide (CO) Emissions
CO emissions shall not exceed 0.196 pound per hour and 0.590 ton per twelve month rolling period;
- 2.1.1.3 Sulfur Dioxide (SO_x) Emissions
SO₂ emissions shall not exceed 0.0014 pound per hour and 0.004 ton per twelve month rolling period;
- 2.1.1.4 Particulate Matter (PM) Emissions
- 2.1.1.4.1 PM emissions shall not exceed 0.0178 pound per hour and 0.054 ton per twelve month rolling period; and
- 2.1.1.4.2 PM emissions shall not exceed 0.3 pound per million BTU heat input, maximum two-hour average; and
- 2.1.1.5 Volatile Organic Compound (VOC) Emissions
VOC emissions shall not exceed 0.012 pound per hour and 0.0386 ton per twelve month rolling period.

2.1.2 Emission Point (Coaters 1 thru 4)

2.1.2.1 Total Volatile Organic Compounds (VOC) Emissions

VOC emissions shall not exceed 0.61 pound per hour and 0.61 ton per rolling twelve (12) month rolling period;

2.1.2.2 Hazardous Air Pollutants (HAPs) Emissions [Methyl Isobutyl Ketone (MIBK)]

HAP emissions shall not exceed 0.61 pound per hour and 0.61 ton per rolling twelve (12) month rolling period; and

2.1.2.3 Total Non-Volatile Organic Compounds (as Acetone) Emissions

Non-VOCs (as Acetone) emissions shall not exceed 4.89 pound per hour and 4.89 ton per rolling twelve (12) month rolling period.

2.1.3 Emission Point (Donaldson Model DFO2-8-R Dust Collectors 1 thru 4)

2.1.3.1 Particulate Matter (PM) Emissions

PM emissions shall not exceed 0.0000288 pound per hour and 0.0000864 ton per twelve month rolling period; and

2.1.3.2 Particulate Matter (PM) Emissions

0.2 grains per standard cubic foot of exhaust air from the baghouse vent.

2.1.4 Emission Point (Donaldson Model DFE 2-24 Dust Collector)

2.1.4.1 Particulate Matter (PM) Emissions

PM emissions shall not exceed 0.0585 pound per hour and 0.061 ton per twelve month rolling period; and

2.1.4.2 Particulate Matter (PM) Emissions

0.2 grains per standard cubic foot of exhaust air from the baghouse vent.

2.2 No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20%) percent opacity for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty-four (24) hour period.

2.3 Odors from this source shall not be detectable beyond the plant property line in sufficient quantities such as to cause a condition of air pollution.

- 2.4 At least 30 calendar days before changing the method of compliance from control device to another such method permitted in 7 **DE Admin Code** 1124, the owner or operator shall comply with all requirements of section 4.3.1 or 4.4.1 of 7 **DE Admin Code** 1124 as well as 7 **DE Admin Code** 1102.

3. Operational Limitations

- 3.1 The owner or operator shall comply with the following operational limits:
- 3.1.1 The Catalytic Oxidizers shall operate on natural gas only and shall not exceed a total of 6,000 hours per each unit per twelve (12) month rolling period.
 - 3.1.2 The Mix Station shall not exceed a total of 2,080 hours per twelve (12) month rolling period.
 - 3.1.3 All emissions from the coating operation equipment shall be directed to the Catalytic Oxidizers. The coating operation shall not be conducted unless the Catalytic Oxidizers are operating properly and consistent with good air pollution control practice for minimizing emissions.
 - 3.1.3.1 Coating Lines 1 & 2 shall be directed to CATOX1; and
 - 3.1.3.2 Coating Lines 3 & 4 shall be directed to CATOX2.
 - 3.1.4 The operational hours for the Catalyst Beds shall not exceed 30,000 hours per unit.
 - 3.1.5 Coating lines 1 thru 4 shall not exceed 6,000 hours per unit per rolling twelve (12) month rolling period.
 - 3.1.6 The Catalytic Oxidizers shall be capable of achieving a minimum destructive efficiency of 98.5%, as per the manufacturer's guarantees.
 - 3.1.7 The temperature of the Catalyst Beds shall range from 536°F - 1058°F at all times when waste gases are being oxidized.
 - 3.1.8 The pressure drop across the Catalytic Oxidizer Beds shall be less than 10.05 inches of water.
 - 3.1.9 The stack exit gas flow rate of the Catalytic Oxidizers shall be approximately 7,695 ACFM when in operation.
 - 3.1.10 Methyl Isobutyl Ketone (MIBK) and Acetone may be the only solvents used in the coating line and vented to the Catalytic Oxidizer.
 - 3.1.11 The pressure differential across the filters in the Donaldson Model DFO2-8-R Dust Collectors shall be maintained between 0.40 and 4.4 inches of water column.

- 3.1.12 The Donaldson Model DFO2-8-R Dust Collectors shall be operated with functional differential pressure gauges.
- 3.1.13 The pressure differential across the filters in the Donaldson Model DFE 2-24 Dust Collector shall be maintained between 1.0 and 8.0 inches of water column.
- 3.1.14 The Donaldson Model DFE 2-24 Dust Collector shall be operated with functional differential pressure gauges.
- 3.2 At all times, including periods of startup, shutdown, and malfunction, the owner or operator shall, to the extent practicable, maintain and operate the facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 3.3 All structural and mechanical components of the equipment or process covered by this Permit shall be maintained in proper operating condition.

4. Testing and Monitoring Requirements

- 4.1 Within ninety (90) days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after initial startup of such facility, the owner or operator shall conduct initial emission testing of CATOX2 to demonstrate compliance with the allowable mass emission rate of VOC (Condition 2.1.2.1), HAP (Condition 2.1.2.2) and the overall destructive efficiency (Condition 3.1.6). Compliance with the total destructive efficiency shall be based on total hydrocarbon (THC) emissions
- 4.2 The Department reserves the right to require that the owner or operator perform additional emission tests in addition to Condition 4.1, using methods approved in advance by the Department.
- 4.3 For all emission testing required under Conditions 4.1 and 4.2 of this permit, the following procedures shall be implemented.
 - 4.3.1 One (1) original and one (1) copy of the test protocol shall be submitted a minimum of forty-five (45) days in advance of the tentative test date to the address in Condition 6.3. The tests shall be conducted in accordance with the State of Delaware and Federal requirements.
 - 4.3.2 The test protocol shall be approved by the Department prior to initiating any testing. Upon approval of the test protocol, the Company shall schedule the compliance demonstration with the Source Testing Engineer. The Department must observe the test for the results to be considered for acceptance.

Draft Permit: APC-2018/0060-CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)

Datwyler Pharma Packaging USA, Inc.

571 Merrimac Avenue

Middletown, Delaware 19709

Catalytic Oxidizers (CATOX1 & CATOX2), Coating Lines 1 thru 4, and Associated Dust Collectors, & Mix Station Dust Collector

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- 4.3.3 The final results of the testing shall be submitted to the Department within sixty (60) days of the test completion. One (1) original and one (1) copy of the test report shall be submitted to the addresses below:

Original to:

Engineering & Compliance Branch
Attn: Permitting Engineer
State Street Commons
100 W. Water Street, Suite 6A
Dover, DE 19904

One (1) Copy to:

Engineering & Compliance Branch
Attn: Source Testing Engineer
715 Grantham Lane
New Castle, DE 19720

- 4.3.4 The final report of the results must meet the following requirements to be considered valid:

4.3.4.1 The full report shall include the emissions test report (including raw data from the test) as well as a summary of the results and a statement of compliance or non-compliance with permit conditions;

4.3.4.2 Summary of Results and Statement of Compliance or Non-Compliance
The owner or operator shall supplement the report from the emissions testing firm with a summary of results that includes the following information:

4.3.4.2.1 A statement that the owner or operator has reviewed the report from the emissions testing firm and agrees with the findings.

4.3.4.2.2 Permit number(s) and condition(s) which are the basis for the compliance evaluation.

4.3.4.2.3 Summary of results with respect to each permit condition.

4.3.4.2.4 Statement of compliance or non-compliance with each permit condition.

- 4.3.5 The results must demonstrate to the Department's satisfaction that the emission unit is operating in compliance with the applicable regulations and conditions of this permit; if the final report of the test results shows non-compliance the owner or operator shall propose corrective action(s). Failure to demonstrate compliance through the test may result in enforcement action.

Draft Permit: APC-2018/0060-CONSTRUCTION(Amendment 2)(VOC RACT)(SM)(MNSR)

Datwyler Pharma Packaging USA, Inc.

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Catalytic Oxidizers (CATOX1 & CATOX2), Coating Lines 1 thru 4, and Associated Dust Collectors, & Mix Station Dust Collector

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- 4.4 When in operation and processing a waste stream, the Catalyst Beds operational temperature shall be continuously monitored to ensure compliance with the range stated in Condition 3.1.7. If the Catalyst Beds operational temperature falls outside of the permitted range, the equipment shall be shut-down and corrective action taken to complete any necessary repairs or maintenance prior to re-starting. Operation, outside the permitted range, other than for re-testing and to show compliance with the permitted range outlined in Condition 3.1.7 is not authorized.
- 4.5 Once per day, during operation of the associated equipment, the pressure drop across the Catalytic Oxidizer Beds shall be monitored to ensure compliance with the range stated in Condition 3.1.8. If the differential pressure falls above the permitted limit, the equipment shall be shut-down and corrective action taken to complete any necessary repairs or maintenance prior to re-starting. Operation, outside the permitted limit , other than for re-testing and to show compliance with the permitted range outlined in Condition 3.1.8 is not authorized.
- 4.6 Once per day, during operation of the associated equipment, the pressure drop across the Donaldson Model Dust Collectors shall be monitored to ensure compliance with the range stated in Conditions 3.1.11 and 3.1.13. If the differential pressure falls above the permitted limit, the equipment shall be shut-down and corrective action taken to complete any necessary repairs or maintenance prior to re-starting. Operation, outside the permitted limit , other than for re-testing and to show compliance with the permitted range outlined in Condition 3.1.11 and 3.1.13 is not authorized.
- 4.7 The owner/operator shall monitor the operational hours of the Catalytic Oxidizers, and the Catalytic Oxidizer Beds.
- 4.8 The owner/operator shall monitor the natural gas usage of the Catalytic Oxidizers.
- 4.9 Once per week, during operation of the associated equipment and during daylight hours, the Company shall observe each Catalytic Oxidizer stack for a period of three (3) minutes to determine compliance with Condition 2.2 of this permit. The detection of the presence or absence of visible emissions shall be in accordance with the procedures of EPA Reference Method 22 (40 CFR 60, Appendix A) paragraphs 4 and 5. This procedure does not require that the opacity of the emissions be determined. Since this procedure requires only the determination of whether a visible emission occurs and does not require the determination of opacity levels, observer certification according to the procedures of EPA Reference Method 9 (40 CFR 60, Appendix A) is not required. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor).

5. Record Keeping Requirements

- 5.1 The owner or operator shall maintain all records necessary for determining compliance with this permit in a readily accessible location for five (5) years and shall make these records available to the Department upon written or verbal request
- 5.2 The following information shall be recorded, initialed and maintained in a log at the frequency specified:
- 5.2.1 The Company shall continuously monitor each Catalyst Bed operational temperature and shall record the operational temperature once per day while a waste stream is being destroyed as outlined in Condition 4.4. Should the catalyst bed operational temperature result in an alarm condition, the Company shall note the date, time, duration, temperature, reason, and corrective action(s) taken to restore the operational temperature to within the permitted range.
- 5.2.2 The Company shall record at least one differential pressure reading for the Catalytic Oxidizers as outlined in Condition 4.5, each day.
- 5.2.3 The Company shall record at least one differential pressure reading for the Donaldson Dust Collectors as outlined in Condition 4.6, each day
- 5.2.4 The Company shall record the operational hours of each Catalytic Oxidizer Bed.
- 5.2.5 The Company shall maintain records of the natural gas usage for each Catalytic Oxidizer.
- 5.2.6 The Company shall maintain records of all visible emissions observations performed in accordance with Condition 4.9 of this permit. These shall include the time, date, and results of the observation. If the equipment did not operate during the period (week or month, as applicable) the observations were to have been performed, this fact shall be so noted.
- 5.2.7 The following shall be collected and recorded each day:
- 5.2.7.1 The name and identification number of each coating used on each coating unit, line, or operation.
- 5.2.7.2 The mass of VOC per unit volume of coating, as applied, and the volume, as applied, of each coating used each day on each coating unit, line, or operation.
- 5.2.7.3 The maximum VOC content (mass of VOC per unit volume of coating, as applied) or the daily-weighted average VOC content (mass of VOC per unit volume of coating, as applied) of the coatings used each day on each coating unit, line, or operation.

- 5.2.7.4 The required overall emission reduction efficiency for each day for each coating unit, line, or operation as determined in 3.0 of Appendix C of regulation 7 **DE Admin Code** 1124.
- 5.2.7.5 The actual overall emission reduction efficiency achieved for each day for each coating unit, line, or operation as determined in 3.0 of Appendix D of regulation 7 **DE Admin Code** 1124.
- 5.2.7.6 Control device monitoring data.
- 5.2.7.7 A log of operating time for each Catalytic Oxidizer and the associated coating operations.
- 5.2.7.8 A maintenance log for each Catalytic Oxidizer detailing all routine and non-routine maintenance performed including dates and duration of any outages. This is to include any corrective action taken per Conditions 4.4, and 4.5.
- 5.2.7.9 All 3-hour periods of operation in which the average temperature of the process vent stream immediately before the catalyst bed is more than 28°C (50°F) below the average temperature of the process vent stream immediately before each Catalyst Bed.
- 5.2.8 Daily pressure drop readings, as measured across the inlet and outlet of the dust collectors whenever the equipment is in operation.
- 5.2.9 All maintenance performed on the dust collector, including maintenance performed in response to troubleshooting or inspections.
- 5.2.10 The occurrence and duration of any malfunction of the dust collectors.
- 5.2.11 Any period the dust collectors are not operational, with beginning of downtime, end of downtime, and reason for downtime.
- 5.2.12 Filter replacements in the dust collectors.
- 5.3 The Company shall keep vendor documents describing the destruction efficiency and maintenance requirements of each Catalytic Oxidizer. The records shall also detail all catalyst bed replacements to include date of replacement and the type of catalyst used.
- 5.4 The Company shall keep vendor documents describing the removal efficiency for all filters used in the dust collectors.
- 5.5 The Company shall keep manufacturer documents describing the recommended maintenance and differential pressure ranges for the dust collectors.

- 5.6 The rolling twelve (12) month totals shall be calculated and recorded each month in a log for each of the following items:
 - 5.6.1 Particulate Matter (PM₁₀) Emissions;
 - 5.6.2 Sulfur Oxides (SO_x) Emissions;
 - 5.6.3 Nitrogen Oxide (NO_x) Emissions;
 - 5.5.4 Carbon Monoxide (CO) Emissions;
 - 5.6.5 Total Volatile Organic Compounds (VOC) Emissions;
 - 5.6.6 Hazardous Air Pollutants (HAP) Emissions; and
 - 5.6.7 Total Non-Volatile Organic Compounds (as Acetone) Emissions.

6. Reporting Requirements

- 6.1 Emissions in excess of any permit condition or emissions which create a condition of air pollution shall be reported to the Department immediately upon discovery by calling the Environmental Emergency Notification and Complaint number, (800) 662-8802.
- 6.2 In addition to complying with condition 6.1 of this permit, any reporting required by **7 DE Admin. Code 1203 "Reporting of Discharge of a Pollutant or an Air Contaminant"**, and any other reporting requirements mandated by the State of Delaware, the owner or operator shall for each occurrence of excess emissions, within thirty (30) calendar days of becoming aware of such occurrence, supply the Department in writing with the following information:
 - 6.2.1 The name and location of the facility;
 - 6.2.2 The subject source(s) that caused the excess emissions;
 - 6.2.3 The time and date of the first observation of the excess emissions;
 - 6.2.4 The cause and expected duration of the excess emissions;
 - 6.2.5 For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
 - 6.2.6 The proposed corrective actions and schedule to correct the conditions causing the excess emissions.

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Datwyler Pharma Packaging USA, Inc.

571 Merrimac Avenue

Middletown, Delaware 19709

Catalytic Oxidizers (CATOX1 & CATOX2), Coating Lines 1 thru 4, and Associated Dust Collectors, & Mix Station Dust Collector

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- 6.3 One (1) original and one (1) copy of all required reports shall be sent to the address below:

Division of Air Quality
State Street Commons
100 W. Water Street, Suite 6A
Dover, DE 19904

7. Administrative Conditions

- 7.1 This permit shall be made available on the premises.
- 7.2 Failure to comply with the provisions of this permit may be grounds for suspension or revocation.
- 7.3 This permit supersedes **Permit: APC-2018/0060-CONSTRUCTION/OPERATION(Amendment 1)(VOC RACT)(SM)(MNSR)**, dated January 29, 2021 and **Permit: APC-2018/0061-OPERATION**, dated September 11, 2018.

Sincerely,

Angela D. Marconi, P.E.
Program Manager
Engineering & Compliance Branch

ADM:KAM:BAK:bak
F:\EngAndCompliance\BAK\bak21021

pc: Dover File\Karen A. Mattio, P.E.\Bradley A. Klotz

DRAFT