39-0927

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

Request for Determination of Changes of Minor Significance and Exemption from Plan Approval/Operating Permit Under Pa Code §127.14 or §127.449

A. Request for:

Exemption from Plan Approval

- ☐ Minor Sources or classes of sources, pursuant to 25 Pa. Code Section 127.14(a)(1)-(7)
- ☐ Other sources and classes of sources of minor significance, pursuant to 25 Pa. Code Section 127.14(a)(8)
- ☐ Physical changes to sources of minor significance, pursuant to 25 Pa. Code Section 127.14(a)(9)
- ☑ Additional physical changes of minor significance that do not add new equipment, pursuant to 25 Pa. Code Section 127.14(c)(1)
- ☐ Additional physical changes of minor significance that add new equipment, pursuant to 25 Pa. Code Section 127.14(c)(2)

Exemption from Operating Permit

- ☐ Other sources and classes of sources of minor significance, pursuant to 25 Pa. Code Section 127.14(a)(8)
- ☑ Physical changes to sources of minor significance, pursuant to 25 Pa. Code Section 127.14(a)(9)
- ☐ Additional physical changes of minor significance that do not add new equipment, pursuant to 25 Pa. Code Section 127.14(c)(1)
- ☐ Additional physical changes of minor significance that add new equipment, pursuant to 25 Pa. Code Section 127.14(c)(2)
- ☐ Changes due to De Minimis increases in emissions, pursuant to 25 Pa. Code Section 127.449

B. Company/Facility Information

Company/Facility Name: B BRAUN MED INC/ALLENTOWN **Plant Name:** 1

Site Address: 901 Marcon Blvd. Allentown PA 18109

Mailing Address: 901 Marcon Blvd. Allentown PA 18109

Federal Employer Identification Number (EIN): 23-2116774

Current Operating Permit No: 39-00055 **NAICS Code:** 339112

Name of Person Completing Form: Eric Geder **Title:** Employee

Address	Telephone: (484) 240-8817
901 Marcon Blvd.	Fax:
Allentown PA 18109	EMail: eric.geder@bbraunusa.com

Name of Company/Facility Contact Person: Eric Geder **Title:** Employee

Address	Telephone: (484) 240-8817
901 Marcon Blvd.	Fax:
Allentown PA 18109	EMail: eric.geder@bbraunusa.com

C. Project Description

Project Type: ☐ New Construction ☑ Modification ☐ Remediation ☐ Other

Total number of sources in project: 0

Description of project: B. Braun is submitting this RFD at the request of PADEP. This RFD concerns the installation at the facility of a dry bed air cleaning device to reduce ethylene oxide emissions from the existing back vents of the sterilization chambers. The installation of the dry bed does not result in any new emissions or the increase of any existing emissions (and therefore would not result in any increased ambient air quality impact for any pollutant), and instead only results in the reduction of emissions. In addition, the installation of the dry bed is not required by any existing regulatory or permit-based standard.

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D. Source Description

Source Name: NA-Dry Bed Emission Control Device for Existing Source

Source Category: Dry Bed Emission Control

Source Location: Sterilization Warehouse

Source Type: ☑ Stationary ☐ Portable

Is equipment existing or proposed? ☐ Existing ☑ Proposed

Actual or Planned Date of Installation: 03/29/2019

Municipality: Hanover **County:** Lehigh

Source Description: B. Braun is submitting this RFD at the request of PADEP. This RFD concerns the installation at the facility of a dry bed air cleaning device to reduce ethylene oxide emissions from the existing back vents of the sterilization chambers. The installation of the dry bed does not result in any new emissions or the increase of any existing emissions (and therefore would not result in any increased ambient air quality impact for any pollutant), and instead only results in the reduction of emissions. In addition, the installation of the dry bed is not required by any existing regulatory or permit-based standard. Rather, the applicable NESHAP regulation, 40 CFR Part 63, Subpart O, exempts the back vents of the sterilization chambers from control requirements. In addition, B. Braun has not and will not rely on emission reductions from the dry bed installation to generate emission reduction credits.

Pollutant	Calculation Method	Emissions (lbs/hr)	Emissions (tons/year)
Particulate	NO FACTOR AVAILABLE	0.0000	0.0000
PM10	NO FACTOR AVAILABLE	0.0000	0.0000
PM2.5	NO FACTOR AVAILABLE	0.0000	0.0000
SOX	NO FACTOR AVAILABLE	0.0000	0.0000
CO	NO FACTOR AVAILABLE	0.0000	0.0000
NOX	NO FACTOR AVAILABLE	0.0000	0.0000
VOC	NO FACTOR AVAILABLE	0.0000	0.0000
Hazardous Air Pollutants	NO FACTOR AVAILABLE	0.0000	0.0000

Will the construction of this source increase emissions from other sources at this facility?

☐ Yes ☑ No

Is the construction or modification of the source subject to 25 Pa. Code, Subchapter E, New Source Review (NSR) requirements or prevention of Significant Deterioration (PSD) of Air Quality regulations at Subchapter D?

☐ Yes ☑ No

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E. Exemption History

Source Name	Date of Installation	Reason for Exemption		
		RFD	Exemption List	De Minimis

F. List of Attached Documents

Description of Attachment	Confidential?
Model DR-490 Installation & Operation Instructions	Y

G. Signature of Responsible Official or Authorized Representative

I, Rex Boland , certify under penalty of law as provided in 18 Pa. C.S.A. § 4904 and 35 P.S. § 4009(b)(2) that based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

Rex Boland	08/22/2019	610-596-2870
Name	**Date**	**Telephone**

901 Marcon Blvd. Allentown PA 18109-9341	rex.boland@bbraunusa.com
Address	**Email Address**

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NOTES
There are no notes associated with this report.

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Request for Determination of Requirement For Plan Approval/Operating Permit (RFD)

OFFICIAL USE ONLY

Facility Name:	B BRAUN MED INC/ALLENTOWN	**RFD Facility ID:**	1973
RFD Application ID:	7956	**Date Received:**	08/22/2019
Reviewed BY:	Shailesh R Patel	**Approved Date:**	09/05/2019
Approved By:	Raymond Kempa		

- [x] **A plan approval is not required for this source (See 25 Pa. Code Section 127.14(a)(1)-(9)).**
- [ ] **A plan approval is not required for this source (See 25 Pa. Code Section 127.14(b)).**
- [ ] **An operating permit is not required for this source (See 25 Pa. Code Section 127.443(a)).**
- [ ] **The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval application.**
- [ ] **The source(s) do(es) not qualify for exemption. Applicant is required to submit an operating permit application.**

Remarks

Conditions