B|BRAUN

42-077-00181
Enforcement

January 26, 2015

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Norm Frederick
Pennsylvania Department of Environmental Protection
Bureau of Air Quality – Title V Section
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18711-0790

RE: Annual Certification of Compliance – Calendar Year 2014
Semi-Annual Title V Deviation Report – July – December 2014
Quarterly Deviation Report – October – December 2014
B. Braun Medical Inc. (TVOP 39-00055)

Dear Mr. Frederick:

B. Braun Medical Inc. (B. Braun) operates a surgical and medical instrument apparatus manufacturing facility in Allentown, Pennsylvania. The B. Braun facility operates pursuant to the permit application shield provisions of Title V Operating Permit Number 39-00055, which was issued on January 13, 2010 and expired on January 13, 2015.

As previously communicated on October 17, 2014 via email, B. Braun Medical, Inc. supports the Department's request to conform with U.S. EPA requirements by providing the Quarterly Deviation Report (as applicable), Semi-Annual Title V Monitoring and Deviation Report, and Annual Certification of Compliance thirty days following the end of each calendar half or quarter to the Department. Please find enclosed for submittal to the Pennsylvania Department of Environmental Protection (PADEP) the Title V Compliance Certification for B. Braun's Allentown, PA facility covering the reporting period from January 1, 2014 through December 31, 2014. The purpose of this submittal is to jointly satisfy the requirements to submit an Annual Compliance Certification for the period of January 1, 2014 through December 31, 2014, a Semi-Annual Deviation report for the period of July 1, 2014 through December 31, 2014, and a Quarterly Deviation Report for the period of October 1, 2014 through December 31, 2014.

If you have any questions, please do not hesitate to call me at 610.596.2584.

Sincerely,

B. Braun Medical, Inc.
Ryan Johnson
Sr. Environmental Health and Safety Specialist

Cc: David Lauer – B. Braun
Lindsey W. Kroos – All4 Inc.
Tara Redding – PADEP
Enforcement Program Section – USEPA

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY
COMPLIANCE CERTIFICATION FORM
(25 Pa. Code § 127.513)

Plant Name:	B BRAUN MED INC/ALLENTOWN	**Owner/Operator:**	B BRAUN MED INC
Tax ID/Plant:	23-2116774-1	**DEP Facility ID:**	514477
Contact Person:	DAVID R LAUER	**Title:**	EH&S MANAGER
Operating Permit #:	39-00055	**Phone Number:**	(610) 596-2584

For the period ***1/01/2014 – 12/31/2014***, **B BRAUN MED INC/ALLENTOWN** has been in continuous compliance with all applicable requirements of permit # **39-00055**, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

Sect./Cond. #	Citation #	Source	Noncompliance	Monitoring Method(s)	Date	Duration	Corrective Action(s)
Section C/#002	*25 Pa Code §123.2*	*Facility*	*Intermittent*	*Visible inspection*	*10-29-14*	*Instantaneous*	***Enhanced continuous water application (wetting agent) from 2" water line. Implemented continual usage of sweeper truck to control dust.***

Certification of Truth, Accuracy and Completeness

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

Name:	*Rex Boland*	**Title:**	*Vice President/General Manager PA Operations*
Signed:	Rex L. Boland	**Date:**	1-26-15

This certification must be signed by a responsible official. Any certification submitted without a valid signature will be returned. The owner/operator shall identify any other material information needed in this certification to also comply with section 113(c)(2) of the Clean Air Act. If more spaces are needed, complete additional pages using the format shown in Addendum 1. This certification does not replace requirements pertaining to the submission of malfunction and CEM reports. DO NOT include that information on this form.

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B ***(#004)***	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air M...	***B. Braun submitted a renewal application at least six months, and not more than 18 months, before the expiration date of this permit (i.e., between July 13, 2013 and July 13, 2014). Additionally, an amended renewal application was submitted to PADEP on December 11, 2014.***	☒Continuous ☐Intermittent
[25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B ***(#006)***	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following: (1) Enter at reasonable times upo...	***B. Braun allows Department representatives onsite during reasonable times as requested.***	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B ***(#007)***	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following: (1) Enforcement action (2) Permit termination, revocation...	***This report serves as the means to determine compliance with this requirement.***	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B ***(#009)***	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. (b) Upon request, the ...	***B. Braun maintains and can make available upon request required records and other information.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code § 127.541] (Significant Operating Permit Modifications)	Section B ***(#012)***	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.	***N/A – this condition is explanatory and does not provide any means by which B. Braun can certify continuous or intermittent compliance. No significant Title V permit modification applications were required to be submitted during the reporting period.***	☐Continuous ☐Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B ***(#016)***	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual...	***B. Braun demonstrates compliance by maintaining accounting records.***	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B ***(#017)***	(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written ...	***B. Braun received RFD approvals for de minimis emission increases of VOC in May 2011 and August 2013 and maintains records to demonstrate that VOC emissions do not exceed the de minimis threshold.***	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B ***(#018)***	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source wil...	***N/A – this condition is explanatory and does not provide any means by which B. Braun can certify continuous or intermittent compliance. B. Braun did not reactivate any sources during the reporting period.***	☐Continuous ☐Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B ***(#019)***	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction,...	***N/A – this condition is explanatory and does not provide any means by which B. Braun can certify continuous or intermittent compliance.***	☐Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B ***(#020)***	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection (At the address given on the permit transmittal letter, or otherwise notified) (b) Any repor...	***B. Braun certifies and submits reports to the applicable locations identified in this condition.***	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B ***(#021)***	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable re...	***B. Braun demonstrates compliance by maintaining records of sampling, testing, and monitoring performed at the facility.***	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B ***(#022)***	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit) and time of sampling or measurements. (2) The dates the analyses were performed. ...	***B. Braun maintains and can make available upon request all required records.***	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)] (Reporting Requirements)	Section B ***(#023)***	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean ...	***B. Braun demonstrates compliance by maintaining records of all required reporting.***	☒Continuous ☐Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B ***(#024)***	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, includi...	***This report serves as the certification of compliance required by this condition. Consistent with Permit Condition #015 of Section C, B. Braun submits this report by March 1 of each year.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B ***(#026)***	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site S...	***N/A – B. Braun is not subject to the Risk Management requirements.***	☐Continuous ☐Intermittent
[25 Pa. Code §123.1] (Prohibition of certain fugitive emissions)	Section C - I. Restrictions - Emission Restriction(s) ***(#001)***	The permitee may not permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following: (1) Construction or demolition of buildings or structures. (2) Grading, paving and maintenance of roads and streets. (3) Use of roads and streets. Emissions f...	***B. Braun demonstrates compliance by recording results of weekly visual observations in a weekly inspection log.***	☒Continuous ☐Intermittent
[25 Pa. Code §123.2] (Fugitive particulate matter)	Section C - I. Restrictions - Emission Restriction(s) ***(#002)***	The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Site Level Condition #001, if such emissions are visible at the point the emissions pass outside the person's property.	***B. Braun demonstrates compliance by recording results of weekly visual observations in a weekly inspection log. Visible emissions beyond property line were noted due to demolition of building (10/29/2014).***	☐Continuous ☒Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C - I. Restrictions - Emission Restriction(s) ***(#003)***	The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.	***B. Braun demonstrates compliance by recording results of observations in a weekly inspection log and by having no documented complaints of malodors outside the property line.***	☒Continuous ☐Intermittent
[25 Pa. Code §123.41] (Limitations)	Section C - I. Restrictions - Emission Restriction(s) ***(#004)***	The permittee may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour. (2) Equal ...	***B. Braun demonstrates compliance by recording results of weekly visual observations in a weekly inspection log.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §123.42] (Exceptions)	Section C - I. Restrictions - Emission Restriction(s) ***(#005)***	The limitations of Site Level Condition #004 shall not apply to a visible emission in any of the following instances: (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations. (2) When the emission results from the operation of equipment ...	***N/A – this condition is explanatory and does not provide any means by which B. Braun can certify continuous or intermittent compliance.***	☐Continuous ☐Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section C - II. Testing Requirements ***(#006)***	All sampling, testing and analysis performed in compliance with the requirements of any section of this permit shall be done in accordance with General Title V Requirements #021.	***B. Braun performs all sampling, testing, and analysis in compliance with the requirements of the facility's permit.***	☒Continuous ☐Intermittent
[25 Pa. Code §139.1] (Sampling facilities.)	Section C - II. Testing Requirements ***(#007)***	Upon the request of the Department, the person responsible for a source shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the fac...	***B. Braun can provide sampling facilities upon request. No tests were requested by the Department during the reporting period.***	☒Continuous ☐Intermittent
[25 Pa. Code §139.2] (Sampling by others.)	Section C - II. Testing Requirements ***(#008)***	Sampling and testing done by persons other than the Department may be accepted by the Department provided that: (1) The Department has been given reasonable notice of the sampling and testing and has been given reasonable opportunity to observe and participate in the sampling and testing. ...	***N/A – this condition is explanatory and does not provide any means by which B. Braun can certify continuous or intermittent compliance. B. Braun notifies PADEP prior to sampling or testing.***	☐Continuous ☐Intermittent
[25 Pa. Code §123.43] (Measuring techniques)	Section C - III. Monitoring Requirements ***(#009)***	Visible emissions may be measured using either of the following: (1) A device approved by the Department and maintained to provide accurate opacity measurements. (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the ...	***B. Braun measures visible emissions with the naked eye by trained personnel.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section C - III. Monitoring Requirements ***(#010)***	The permittee shall conduct a weekly inspection during daylight hours when the plant is in production to inspect for visible, fugitive, and malodor emissions. If visible, fugitive or malodor emissions are detected, corrective actions shall be taken immediately to abate the emission.	***B. Braun demonstrates compliance by recording results of weekly visual observations in a weekly inspection log.***	☒Continuous ☐Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section C - IV. Recordkeeping Requirements ***(#011)***	All records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with General Title V Requirement #022, Section B, and shall be made available to the Department upon written or verbal request at a reasonable tim...	***B. Braun maintains and can make available upon request all required records.***	☒Continuous ☐Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section C - IV. Recordkeeping Requirements ***(#012)***	All weekly inspection results for visible, fugitive, or malodor emissions, shall be recorded in a logbook. The logbook shall be maintained on-site and be made available to the Department upon request. At a minimum, the permittee shall record the date, time, results of the inspection, and individual ...	***B. Braun maintains and can make available upon request required records of results of weekly visual observations.***	☒Continuous ☐Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section C - V. Reporting Requirements ***(#013)***	On a quarterly basis, the permittee shall compile a report of all logged instances of exceedance of the fugitive, visible and malodor emission limitations, as required by Site Level Conditions #001, #003 and #004, that occurred during the previous three (3) months. These reports shall be submitted t...	***B. Braun demonstrates compliance by maintaining records of all required reporting.***	☒Continuous ☐Intermittent
[25 Pa. Code §127.511] (Monitoring and related recordkeeping and reporting requirements.)	Section C - V. Reporting Requirements ***(#014)***	1) The company, within one hour of occurrence, shall notify the Department, at 610-861-2070, of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or esta...	***B. Braun demonstrates compliance by maintaining records of all required notifications.***	☒Continuous ☐Intermittent
[25 Pa. Code §127.513] (Compliance certification.)	Section C - V. Reporting Requirements ***(#015)***	Compliance certification The reporting period for the certificate of compliance required by condition #024 of Section B, shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1st.	***B. Braun demonstrates compliance by maintaining records of all required reporting.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §123.1] (Prohibition of certain fugitive emissions)	Section C - VI. Work Practice Standards ***(#016)***	The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following: (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction ...	***B. Braun takes action to prevent particulate matter from becoming airborne if necessary. B. Braun demonstrates compliance by maintaining records of all required reporting.***	☒Continuous ☐Intermittent
[25 Pa. Code §129.14] (Open burning operations)	Section C - VI. Work Practice Standards ***(#017)***	(a) Air basins. No person may permit the open burning of material in an air basin. (b) Exceptions: The requirements of subsections (a) do not apply where the open burning operations result from: (1) A fire set to prevent or abate a fire hazard, when approved by the Department a...	***B. Braun does not conduct any open burning as it is not permitted by local authorities.***	☒Continuous ☐Intermittent
[25 Pa. Code §127.512] (Operating permit terms and conditions.)	Section C - VII. Additional Requirements ***(#018)***	Internal combustion engines regardless of size, with combined NOx emissions less than 100 lbs/hr, 1000 lbs/day, 2.75 tons per ozone season and 6.6 tons per year on a 12-month rolling basis for all exempt engines at the site.	***B. Braun demonstrates compliance by maintaining records of the hours of operation for each internal combustion engine to ensure they do not exceed the hourly limitations contained in Section E, GRP2 Condition #003, which prevent emissions from exceeding the thresholds in this condition.***	☒Continuous ☐Intermittent

The following conditions apply to GRP1, which includes the following emission units:

- ***101 - STERILIZER - 1000 CU FT***
- ***102 - STERILIZER - 1000 CU FT***
- ***103 - STERILIZER - 1000 CU FT***
- ***104 - STERILIZER - 1000 CU FT***
- ***105 - STERILIZER - 1200 CU FT***
- ***106 - STERILIZER - 1250 CU FT***
- ***107 - STERILIZER - 3700 CU FT***
- ***108 - STERILIZER - 130 CU FT***
- ***110 - AERATION ROOM***

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GRP1 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.362] (Standards.)	Section D - I. Restrictions - Emission Restriction(s) ***(#001)***	(a) Each owner or operator of a source subject to the provisions of this subpart shall comply with these requirements on and after the compliance date specified in Sec. 63.360(g). The standards of this section are summarized in Table 1 of this section. Table 1 of Section 63.362.-- Standards for...	***B. Braun demonstrates compliance by maintaining the Deoxx Wet Scrubber according to manufacturer recommendations and replacing the catalyst of the Catalytic Oxidizer controlling the aeration room vent every five (5) years. The catalyst was replaced in March 2009 and 2014. The next replacement is required by March 2019.***	☒Continuous ☐Intermittent
GRP1 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.365] (Test methods and procedures.)	Section D - II. Testing Requirements ***(#002)***	(a) Performance testing. The owner or operator of a source subject to the emissions standards in Sec. 63.362 shall comply with the performance testing requirements in Sec. 63.7 of subpart A of this part, according to the applicability in Table 1 of Sec. 63.360, and in this section. (b) Effi...	***B. Braun demonstrates compliance by maintaining records of all testing performed according to General Title V Condition #022.***	☒Continuous ☐Intermittent
GRP1 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.363] (Compliance and performance provisions.)	Section D - III. Monitoring Requirements ***(#003)***	(a) (1) The owner or operator of a source subject to emissions standards in Sec. 63.362 shall conduct an initial performance test using the procedures listed in Sec. 63.7 according to the applicability in Table 1 of Sec. 63.360, the procedures listed in this section, and the test methods listed ...	***B. Braun demonstrates compliance by maintaining records of the initial performance tests and of all testing performed according to General Title V Condition #022, as well as by monitoring and recording the Deoxx Wet Scrubber liquor level once per week and monitoring and recording temperature data for the Catalytic Oxidizer.***	☒Continuous ☐Intermittent
GRP1 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.364] (Monitoring requirements.)	Section D - III. Monitoring Requirements ***(#004)***	(a)(1) The owner or operator of a source subject to emissions standards in Sec. 63.362 shall comply with the monitoring requirements in Sec. 63.8 of subpart A of this part, according to the applicability in Table 1 of Sec. 63.360, and in this section. (2) Each owner or operator of an ethy...	***B. Braun demonstrates compliance by monitoring and recording the Deoxx Wet Scrubber liquor level once per week and monitoring and recording temperature data for the Catalytic Oxidizer.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GRP1 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.367] (Recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements ***(#005)***	(a) The owner or operator of a source subject to Sec. 63.362 shall comply with the recordkeeping requirements in Sec. 63.10(b) and (c), according to the applicability in Table 1 of Sec. 63.360, and in this section. All records required to be maintained by this subpart or a subpart referenced by ...	***B. Braun maintains and can make available upon request all required records.***	☒Continuous ☐Intermittent
GRP1 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.366] (Reporting requirements.)	Section D - V. Reporting Requirements ***(#006)***	(a) The owner or operator of a source subject to the emissions standards in Sec. 63.362 shall fulfill all reporting requirements in Secs. 63.10(a), (d), (e), and (f) of subpart A, according to the applicability in Table 1 of Sec. 63.360. These reports will be made to the Administrator at the app...	***B. Braun demonstrates compliance by maintaining records of all required reporting.***	☒Continuous ☐Intermittent
GRP1 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VII. Additional Requirements ***(#007)***	1. Minimum oxidation temperature for the Donaldson catalytic oxidizer shall be 253 deg F (low level EtO concentration) and 258 deg F (high level EtO concentration). 2. Chemrox Deoxx scrubber liquid level maximum shall be 126 inches.	***B. Braun demonstrates compliance by monitoring and recording the Deoxx Wet Scrubber liquor level once per week and monitoring and recording temperature data for the Catalytic Oxidizer.***	☒Continuous ☐Intermittent
The following conditions apply to GRP2, which includes the following emission units: ▪ ***003 – EMERGENCY GENERATOR – 605HP DIESEL*** ▪ ***004 – FIRE PUMP – 100HP DIESEL*** ▪ ***111 – EMERGENCY GENERATOR 2*** ▪ ***112 – EMERGENCY GENERATOR 1*** ▪ ***113 – FIRE PUMP*** ▪ ***114 – EMERGENCY GENERATOR – KOHLER 30 KW; NATURAL GAS – As presented in the amended TVOP Renewal Application submitted on December 8, 2014, Source 114 is no longer in use, but will remain in the TVOP.***				
GRP2 [25 Pa. Code §123.13] (Processes)	Section D - I. Restrictions - Emission Restriction(s) ***(#001)***	The permittee may not permit the emission into the outdoor atmosphere of particulate matter, expressed as PM, from each source of this group in excess of the following rate: (i) .04 grain per dry standard cubic foot, when the effluent gas volume is less t...	***B. Braun demonstrates compliance by continued good operation and maintenance practices.***	☒Continuous ☐Intermittent
GRP2 [25 Pa. Code §123.21] (General)	Section D - I. Restrictions - Emission Restriction(s) ***(#002)***	The permittee may not permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, from each source of this group in excess of the following rate: ...	***B. Braun demonstrates compliance by verifying the type of fuel burned and its sulfur content.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GRP2 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Operating Hours Restriction(s) ***(#003)***	Each source in this group shall operate no more than 242 hours during the May 1 through September 30 ozone season of each year, and no more than 500 hours during any consecutive 12-month period.	***B. Braun demonstrates compliance by recording the total hours of operation for each source on a monthly basis pursuant to Condition #004.***	☒Continuous ☐Intermittent
GRP2 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements ***(#004)***	The permittee shall record the total hours of operation for each source on a monthly basis. The data recorded shall include, but not be limited to: (1) The name of the source which was operated. (2) The hours of operation of each source. Measurements, records and other data shall be maintained in...	***B. Braun maintains and can make available upon request all required records.***	☒Continuous ☐Intermittent
GRP2 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VI. Work Practice Standards ***(#005)***	The sources shall be operated in accordance with the manufacturers specification and the source shall also be operated and maintained in accordance with good air pollution practices.	***B. Braun demonstrates compliance by continued good operation and maintenance practices.***	☒Continuous ☐Intermittent
The following conditions apply to GRP3, which includes the following emission units: ▪ ***031 – BOILER – KEWANEE 19.5 MMBTU/HR*** ▪ ***032 – BOILER – KEWANEE 10.0 MMBTU/HR*** ***As presented in the amended TVOP Renewal Application, B. Braun has permanently discontinued operation of Sources 031 and 032.***				
GRP3 [25 Pa. Code §123.11] (Combustion units)	Section D - I. Restrictions - Emission Restriction(s) ***(#001)***	The permittee may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the following: (1) The rate of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but les...	***B. Braun demonstrates compliance by maintaining records of past performance tests and continued good operation and maintenance practices.***	☒Continuous ☐Intermittent
GRP3 [25 Pa. Code §123.22] (Combustion units)	Section D - I. Restrictions - Emission Restriction(s) ***(#002)***	No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.	***B. Braun demonstrates compliance by verifying the type of fuel burned and its sulfur content.***	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
GRP3 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s) ***(#003)***	The type of fuel usage for each source of this source group shall be the following: (1) The 10.0 MMBtu/hr boiler shall be fired either with No. 6 fuel oil or natural gas. The primary fuel is the No. 6 fuel oil and the secondary fuel is natural gas. (2) The percent (%) by weight of sulfur content o...	***B. Braun demonstrates compliance by maintaining records of fuel usage and sulfur content. Source ID 032 no longer fires No. 6 fuel oil. B. Braun has disconnected the fuel line and has disconnected, emptied, and taken the UST that stored No. 6 fuel oil out of service as of March 2012.***	☒Continuous ☐Intermittent
GRP3 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements ***(#004)***	Prior to firing any deliveries of No. 6 fuel oil, the permittee shall either test the fuel oil to demonstrate compliance with the sulfur requirements or must receive a certification from the fuel supplier guaranteeing that the fuel meets the sulfur limit.	***B. Braun demonstrates compliance by maintaining records of fuel sulfur content certifications. Source ID 032 no longer fires No. 6 fuel oil. B. Braun has disconnected the fuel line and has disconnected, emptied, and taken the UST that stored No. 6 fuel oil out of service as of March 2012.***	☒Continuous ☐Intermittent