



Air Quality Operating Permit Application Form

Lincoln-Lancaster County Health Department
 Environmental Public Health Division - Air Quality Program
 Lincoln, NE 68510
 ph: (402) 441-8040 fax: (402) 441-3890
<http://www.lincoln.ne.gov/city/health/envIRON/air.htm>

Purpose of Application: Initial Operating Permit Operating Permit Modification
 Operating Permit Renewal Revise Previously Submitted Application

SECTION 1: ADMINISTRATIVE INFORMATION AND RESPONSIBLE OFFICIAL CERTIFICATION

Part A: Company Information

Company Name:	GSK Consumer Health, Inc.				
Company Address:	184 Liberty Corner Road, Suite 200				
Company City:	Warren	Company State:	New Jersey	Company ZIP:	07059
Is the business incorporated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If so, name the state where incorporated:	New Jersey		

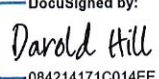
Part B: General Facility Information

Facility Name:	GSK Consumer Health, Inc.				
LLCHD Facility ID #:	00064				
Facility Physical Address:	10401 Cornhusker Highway				
Facility City:	Lincoln	Facility State:	Nebraska	Facility ZIP:	68517
Facility NAICS Code(s):	325412	Pharmaceutical Preparation Manufacturing			
Is the facility located within 50 miles of another state?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If so, which state(s)?	<input checked="" type="checkbox"/> Iowa	<input type="checkbox"/> Kansas	<input type="checkbox"/> Missouri
Is the facility located on leased property?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				

Part C: Contact Information

Facility Contact Person:	Tammi Williams				
Facility Contact Person Title or Responsibility:	Environmental, Health, and Safety (EHS) Specialist - Industrial Hygiene				
Phone Number:	(531) 510-4829	E-Mail:	tammi.r.williams@haleon.com		
Alternate Phone Number: (optional)	(402) 464-6311	Fax Number: (optional)			
Who is the primary contact for questions regarding this application?	<input type="checkbox"/> Facility Contact Person <input checked="" type="checkbox"/> Other		If other, provide the following information:		
Primary Contact Person:	Eric Sturm				
Primary Contact Person Company: (if different)	Air Regulations Consulting, LLC (ARC)				
Phone Number:	(402) 817-7887	E-Mail:	eric@airregconsulting.com		
Alternate Phone Number: (optional)	(402) 310-4211	Fax Number: (optional)	(855) 792-5366		

SECTION 1: ADMINISTRATIVE INFORMATION AND RESPONSIBLE OFFICIAL CERTIFICATION

Part D: Permit Information	
Does this facility currently hold an operating permit issued by the LLCHD?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If so, what type of operating permit does the facility hold?	<input type="checkbox"/> Class I (Title V) - Major Source <input type="checkbox"/> Class II - Minor Source <input checked="" type="checkbox"/> Class II - Synthetic Minor Source
What is the expiration date of the operating permit you currently hold?	3/1/2018
Does this facility currently hold one or more construction permits issued by the LLCHD?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you know what type of permit you are applying for, check the appropriate box:	<input type="checkbox"/> Class I (Title V) - Major Source <input checked="" type="checkbox"/> Class II - Minor Source <input type="checkbox"/> Class II - Synthetic Minor Source <input type="checkbox"/> I do not know permit type.
Part E: Responsible Official Certification	
Compliance Certification <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	<p>I hereby certify that, based on information and belief formed after reasonable inquiry, the facility that emits air pollutants, which is identified in this application and that is subject to the applicable requirements identified in Section 9:</p> <p>1. Is in compliance with all applicable requirements, except as described in Section 9;</p> <p>2. Will continue to comply with all applicable requirements for which compliance has been achieved; and,</p> <p>3. Will comply with all applicable requirements for which compliance is not currently achieved</p>
Truth and Accuracy Certification <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	<p>I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this Air Quality Operating Permit application are true, complete, and accurate. I certify that all hard copies of this application are identical in content.</p>
Electronic Copy Certification <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree <input type="checkbox"/> Not Applicable	<p>I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in the electronic copy of the Air Quality Operating Permit application are identical in content to the hard copy submittal.</p>
Citizenship Attestation <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	<p>For the purpose of complying with Neb. Rev. Stat. §§4-108 through 4-114, I attest as follows (<u>check one</u>):</p> <p><input checked="" type="checkbox"/> I am a citizen of the United States.</p> <p>OR</p> <p><input type="checkbox"/> I am a qualified alien under the federal Immigration and Nationality Act, and will provide my immigration status, alien number, and USCIS documentation upon request.</p> <p>I hereby attest that my responses and the information provided on this form and any related application for public benefits are true, complete, and accurate, and I understand that this information may be used to verify my lawful presence in the United States.</p>
Responsible Official Name: (printed or typed)	Darold Hill
Responsible Official Title:	Site Director
Responsible Official Signature:	DocuSigned by:  084214171C014EE...
Date:	9/23/2022



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SECTION 2: DETAILED SOURCE INFORMATION

Part A: Operating Schedule

Is this source operated seasonally, or year-round?	<input type="checkbox"/> Seasonal	<input checked="" type="checkbox"/> Year-Round	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide the normal operating schedule:	Hours per Day:		24
	Days per Week:		7
	Weeks per Year:		52

Does the source operate under an alternative schedule on a regular basis? Yes No

Part B: Facility Description

On separate sheet(s) of paper, provide a detailed narrative description of the facility. Explain the stages in each process that may result in the discharge of an air pollutant. Include all emission points, emission units, pollution control equipment, and identification numbers. The narrative should complement the facility layout and process flow diagrams.

Is a Facility Description attached to your application? Yes No

Part C: Facility Layout Diagram

On a separate sheet(s) of paper, provide a detailed diagram or site drawing that includes all buildings, stacks, emission points and units, control equipment, tanks, etc. identified in this application. Make sure all elements in the drawing are properly identified, drawn to scale, and consistent with other sections of this application. The facility diagram should show the location of all buildings, structures, stacks, and property boundaries. Fences or other public access restrictions should be shown or identified and described. Be sure to identify adjacent roads and include a north arrow. Include an effective date for the diagram.

Is a Facility Layout Diagram included with your application? Yes No

Part D: Process Flow Diagram

On separate sheet(s) of paper, provide a detailed narrative description of the facility. Explain the stages in each process that may result in the discharge of an air pollutant. Include all emission points, emission units, pollution control equipment, and identification numbers. The narrative should complement the facility layout and process flow diagrams.

Is a Process Flow Diagram included with your application? Yes No



SECTION 3 – EMISSION POINT SUMMARY

Table 3-A: Emission Unit Identification

Point #	Emission Unit #		Source Classification (SCC)	Code #	Emission Point Description	Emission Segment Description
	Segment #					
1	1		1-02-006-02		Kewanee Boiler #1	Natural Gas
1	2		1-02-005-02		Kewanee Boiler #1	#2 Fuel Oil
2	1		1-02-006-02		Kewanee Boiler #2	Natural Gas
2	2		1-02-005-02		Kewanee Boiler #2	#2 Fuel Oil
3	1		1-02-006-02		Kewanee Boiler #3	Natural Gas
3	2		1-02-005-02		Kewanee Boiler #3	#2 Fuel Oil
5	1		5-01-007-01		Wastewater Treatment Plant	Sewage Treatment
8	1		3-01-060-09		SMF Fluid Bed Dryer	Air Dryer
17	1		3-01-060-11		SMF Film Coating	Coating Process
40	1		3-01-060-08		Weighting Operations Dust Collector	Exhaust System
43	1		3-01-060-11		SMF Film Coating	Coating Process
44	3		2-02-002-53		Natural Gas Emergency Generator (Recip. Engine)	Natural Gas
44	1		2-02-001-02		Diesel Fire Pump (Recip. Engine)	#2 Fuel Oil
45	1		3-01-060-22		SMF West Granulation, Bin Washing Area	Misc. Fugitives
45	2		3-01-060-22		SMF, Solutions Preparation Area	Misc. Fugitives
45	3		3-01-060-22		SDF, Equipment Cleaning Area	Misc. Fugitives
45	4		3-01-060-22		Packaging Operations	Misc. Fugitives
45	5		3-01-060-22		Equipment Washing Area	Misc. Fugitives
48	1		3-01-060-08		Packaging Dust Collectors	Exhaust System
48	2		3-01-060-08		Caplet/Tablet Packaging Dust Collectors	Exhaust System
50	1		3-85-001-01		Cooling Tower 1	Cooling Tower
51	1		3-85-001-01		Cooling Tower 2	Cooling Tower
52	1		3-85-001-01		Cooling Tower 3	Cooling Tower
53	1		3-85-001-01		Cooling Tower 4	Cooling Tower
54	1		3-85-001-01		Cooling Tower 5	Cooling Tower
55	1		3-01-060-11		Film Coating Dust Collectors	Coating Process
56	1		3-01-060-12		SMF Dust Collectors	Exhaust System
57	1		3-01-060-08		Compression Exhaust Dust Collectors	Exhaust System



SECTION 3 – EMISSION POINT SUMMARY

Table 3-B: Stack / Release Point Information

* Stack information not required for fugitive sources.

Emission Unit #	Associated Emission Unit	Latitude (decimal deg.)	Longitude (decimal deg.)	Elevation (feet a.s.l.)	Stack Height (feet)	Stack Inside Diameter (feet)	Exhaust Temp. (°F)	Exhaust Exit Velocity (feet/sec)	Exhaust Flow Rate (cu. feet/sec)	Vertical, Horizontal, or Fugitive	Raincap Present?
1-1	Kewanee Boiler #1	40.886265	-96.580124	1,127.00	30.20	1.50	375.00	36.61	64.70	Vertical	No
1-2	Kewanee Boiler #1	40.886265	-96.580124	1,127.00	30.20	1.50	375.00	36.61	64.70	Vertical	No
2-1	Kewanee Boiler #2	40.886265	-96.580124	1,127.00	30.20	1.50	375.00	36.61	64.70	Vertical	No
2-2	Kewanee Boiler #2	40.886265	-96.580124	1,127.00	30.20	1.50	375.00	36.61	64.70	Vertical	No
3-1	Kewanee Boiler #3	40.886265	-96.580124	1,127.00	30.20	1.50	375.00	36.61	64.70	Vertical	No
3-2	Kewanee Boiler #3	40.886265	-96.580124	1,127.00	30.20	1.50	375.00	36.61	64.70	Vertical	No
5-1	Wastewater Treatment Plant									Fugitive	
8-1	SMF Fluid Bed Dryer									Fugitive	
17-1	SMF Film Coating									Fugitive	
40-1	Weighting Operations Dust Collector									Fugitive	
43-1	SMF Film Coating									Fugitive	
44-3	Natural Gas Emergency Generator (Recip. Engine)									Vertical	Yes
44-1	Diesel Fire Pump (Recip. Engine)	40.886265	-96.580124	1,127.00	25.00	0.50	842.00	87.33	17.15	Vertical	Yes
45-1	SMF West Granulation, Bin Washing Area	40.886265	-96.580124	1,127.00	25.00	0.50	842.00	87.33	17.15	Vertical	Yes
45-2	SMF, Solutions Preparation Area									Fugitive	
45-3	SDF, Equipment Cleaning Area									Fugitive	
45-4	Packaging Operations									Fugitive	
45-5	Equipment Washing Area									Fugitive	
48-1	Packaging Dust Collectors									Fugitive	
48-2	Caplet/Tablet Packaging Dust Collectors									Fugitive	
50-1	Cooling Tower-1									Fugitive	
51-1	Cooling Tower 2									Fugitive	
52-1	Cooling Tower 3									Fugitive	
53-1	Cooling Tower 4									Fugitive	
54-1	Cooling Tower 5									Fugitive	
55-1	Film Coating Dust Collectors									Fugitive	
56-1	SMF Dust Collectors									Fugitive	
57-1	Compression Exhaust Dust Collectors									Fugitive	



SECTION 4 – INSIGNIFICANT ACTIVITIES

Table 4-A: Insignificant Activities List

Insignificant Activity Type	Description of Insignificant Activity
Space Heaters	<100,000 Btu/hr - Natural Gas
Fuel Oil Storage	Fuel Oil for Boilers, See 4-B
Lab Equipment	Laboratory equipment with hoods/vents used for non-process related activities
Chilling	Enclosed chillers and boiler water treatment, small trace GHG leaks
Fire Suppression	Fire suppression systems, small trace GHG leaks
Fuel Oil Storage	Fuel Oil for Boilers, See 4-B
Fuel Oil Storage	Fuel Oil for Fire Pump, See 4-B
Fuel Oil Storage	Fuel Oil for Outdoor Equipment, See 4-B
Water System Chlorination	Previously 46-2, No longer using chlorine



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SECTION 4 – INSIGNIFICANT ACTIVITIES

Table 4-B: Fuel Storage and Distribution Equipment Information

Equipment ID	Installation Date	Fuel Type	Maximum Capacity (gallons) or Maximum Flow Rate (gals/min)	Vapor Pressure @ Standard Conditions (psi)
4-1	2015	Fuel Oil for Boilers	20,000	<10kPa
44-2	1/1/1995	Fuel Oil for Fire Pump	300	<10kPa
N/A	8/1/2023	Fuel Oil for Lawn Care Equipment	500	<10kPa



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SECTION 5 – MAXIMUM POTENTIAL TO EMIT (MPTE)

Table 5-B: Facility-Wide MPTE – VOC Emissions from VOC-Containing Materials

Please list the maximum throughput of all materials used that contain Volatile Organic Compounds, and show amount of VOC emitted.

Material Name	Manufacturer	Emission Unit #s)	Material Purpose	Material Throughput (gallons)	Product Density (lbs/gallon)	VOC Content		Total VOC (pounds)	Release Factor (% release)	Total VOC Emissions (pounds)
						(weight %)	(select one) (lbs/gallon)			
Isopropyl Alcohol 70%	Steris	45	Clean/Sanitize	3,029	6.55	70.00%		13,889.0	90.00%	12,500.1
Isopropyl Alcohol 99%	Dow Chemical	45	Clean/Sanitize	2,019	6.55	99.00%		13,097.6	90.00%	11,787.8



SECTION 5 – MAXIMUM POTENTIAL TO EMIT (MPTE)

Table 5-D: Maximum Potential to Emit and Operating Permit Thresholds

Criteria Pollutant Name	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
PM ₁₀	16.08	15.0	Yes	100.0	No
PM _{2.5}	3.00				
NOx	27.03	40.0	No	100.0	No
SOx	12.31	40.0	No	100.0	No
VOC	44.06	40.0	Yes	100.0	No
CO	28.76	50.0	No	100.0	No
Lead	0.002	0.6	No	5.0	No
GHGs	41,835.75				
HAP Category	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
Greatest Single HAP	5.00	2.5	Yes	10.0	No
Total Combined HAP	5.61	10.0	No	25.0	No



SECTION 6 – DETERMINATION OF SOURCE CLASS

Table 6-A: Source-Elected Throughput Limits and Emission Control Requirements

In the table below, indicate which emission units you will either accept throughput limits on, or to which you will agree to apply control equipment.

Emission Unit #	SCC Code	Agree to Throughput Limit?	Maximum Annual Throughput	Annual Throughput Limit	Throughput Units	Agree to Emission Controls?	Control Device ID	Control Type	If 'Other', Specify Type
1-1	1-02-006-02	No	149.80		MMcf/yr	No			
1-2	1-02-005-02	No	1,127		Mgal/yr	No			
2-1	1-02-006-02	No	149.80		MMcf/yr	No			
2-2	1-02-005-02	No	1,127		Mgal/yr	No			
3-1	1-02-006-02	No	149.80		MMcf/yr	No			
3-2	1-02-005-02	No	1,127		Mgal/yr	No			
5-1	5-01-007-01	No	5,04E+07		Gals/yr	No			
8-1	3-01-060-09	No	2,90E+06		Lbs/yr	Yes	20 Micron Bag Filters	Fabric Filter	
17-1	3-01-060-11	No	2,41E+06		Lbs/yr	No			
40-1	3-01-060-08	No	1,85E+07		Lbs/yr	No			
43-1	3-01-060-11	No	2,41E+06		Lbs/yr	No			
44-3	2-02-002-53	No	8,19E+07		scf/yr	No			
44-1	2-02-001-02	No	273,750		Gals/yr	No			
45-1	3-01-060-22	No	992,07		Lbs/yr	No			
45-2	3-01-060-22	No	3,968		Lbs/yr	No			
45-3	3-01-060-22	No	23,151		Lbs/yr	No			
45-4	3-01-060-22	No	3,968		Lbs/yr	No			
45-5	3-01-060-22	No	992,07		Lbs/yr	No			
48-1	3-01-060-08	No	8,46E+07		Lbs/yr	No			
48-2	3-01-060-08	No	8,46E+07		Lbs/yr	No			
50-1	3-85-001-01	No	1,26E+09		Gals/yr	No			
51-1	3-85-001-01	No	1,26E+09		Gals/yr	No			
52-1	3-85-001-01	No	1,05E+09		Gals/yr	No			
53-1	3-85-001-01	No	1,05E+09		Gals/yr	No			
54-1	3-85-001-01	No	1,26E+09		Gals/yr	No			
55-1	3-01-060-11	No	2,41E+06		Lbs/yr	No			
56-1	3-01-060-12	No	452,191		Lbs/yr	No			
57-1	3-01-060-08	No	904,382		Lbs/yr	No			



SECTION 7 – ACTUAL MAXIMUM POTENTIAL TO EMIT (APTE)

Table 7-B: Facility-Wide APTE – VOC Emissions from VOC-Containing Materials

Please indicate whether you are accepting throughput limits or emission control requirements for VOC-containing materials. Emissions will be calculated in units of pounds.

Material Name	Manufacturer	Emission Unit # (s)	Material Purpose	Material Throughput (gallons)	Product Density (lbs/gallon)	VOC Content		Total VOC (pounds)	Release Factor (% release)	Total VOC Emissions (pounds)
						(weight %)	(select one) (lbs/gallon)			
Isopropyl Alcohol 70%	Steris	45	Clean/Sanitize	3,029	6.55	70.00%		13,889.0	90.00%	12,500.1
Isopropyl Alcohol 99%	Dow Chemical	45	Clean/Sanitize	2,019	6.55	99.00%		13,097.6	90.00%	11,787.8



SECTION 7 – ACTUAL POTENTIAL TO EMIT (APTE)

Table 7-D: Actual Potential to Emit and Operating Permit Thresholds

Criteria Pollutant Name	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
PM ₁₀	16.08	15.0	Yes	100.0	No
PM _{2.5}	3.00				
NOx	27.03	40.0	No	100.0	No
SOx	12.31	40.0	No	100.0	No
VOC	44.06	40.0	Yes	100.0	No
CO	28.76	50.0	No	100.0	No
Lead	0.002	0.6	No	5.0	No
GHGs	41,835.75				
HAP Category	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
Greatest Single HAP	5.00	2.5	Yes	10.0	No
Total Combined HAP	5.61	10.0	No	25.0	No



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SECTION 8: PERMIT SHIELD

Part A: Permit Shield Applicability

Only Class I (Title V) sources are eligible to obtain a permit shield. Skip the remainder of Section 8 and proceed to Section 9.

<input type="checkbox"/> Yes	
<input type="checkbox"/> No	

Part B: Regulations Included Under Permit Shield

Regulation Citation (e.g. 40 CFR 63 Subpart A)	Regulation Name (e.g. General Provisions)	Reason(s) why regulation does not apply.



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SECTION 9: APPLICABLE RULES AND REQUIREMENTS

PART A: Applicable Requirements of the LLCAPCPRS

Applicable requirements for your source may include maintaining allowable stack opacity, maintaining allowable particulate emissions for the total given heat input, adhering to fugitive dust regulations, adhering to the process weight/particulate emissions rates, adhering to all construction permit conditions, etc. In the boxes below, check all of those requirements in the LLCAPCPRS that may apply to your source, and identify the method by which you intend to demonstrate compliance with the requirement. If a requirement does not apply to your source, briefly explain the reason it does not apply.

Requirement Citation & Name	Does standard apply?	If "Yes", describe compliance method. If "No", explain reason it does not apply.
LLCAPCPRS Article 2, Section 18: New Source Performance Standards (40 CFR Part 60)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Describe compliance with each applicable NSPS in Part B, below.
LLCAPCPRS Article 2, Section 19: Prevention of Significant Deterioration (PSD) of Air Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not a major source for PSD.
LLCAPCPRS Article 2, Section 20, paragraph (A)(1): Particulate Emission Stds. for Incinerators & Burn-Ovens	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Source does not have incinerators or burn-ovens.
LLCAPCPRS Article 2, Section 20, paragraph (B): Particulate Emission Stds. for Combustion Units >10,000 & <10 MMBtu	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No boilers greater than 10,000 MMBtu, and boilers under 10 MMBtu are insignificant.
LLCAPCPRS Article 2, Section 20, paragraph (C): Particulate Emission Stds. for Combustion Units <10,000 & >10 MMBtu	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using AP-42 emission factors (EF)
LLCAPCPRS Article 2, Section 20, paragraph (E): <20% Opacity of Visible Emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using EPA Methods 9 and 22.
LLCAPCPRS Article 2, Section 20, Table 20-1: Process Weight Rate Particulate Emission Stds.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using AP-42 EF and emission controls.
LLCAPCPRS Article 2, Section 21: Compliance Assurance Monitoring (CAM) (40 CFR Part 64)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Does not apply to Class II sources, but Class I sources must give explanation in Part C.
LLCAPCPRS Article 2, Section 22, paragraph (A)(14): Standards for Pathological Material Incinerators	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No pathological incinerators located at this source.
LLCAPCPRS Article 2, Section 22, paragraph (C): Standards for Air Curtain Incinerators	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No air curtain incinerators located at this source.
LLCAPCPRS Article 2, Section 23: Hazardous Air Pollutants - Emission Standards (40 CFR Part 61)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If none apply, in Part C, list any that 'appear' to apply, but do not actually apply.
LLCAPCPRS Article 2, Section 24: Sulfur Compound Emissions - Existing Sources - Emission Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using AP-42 EF.
LLCAPCPRS Article 2, Section 25: Nitrogen Oxides - Emission Standards for Existing Stationary Sources	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Source is not a nitric acid plant.
LLCAPCPRS Article 2, Section 26: Acid Rain (40 CFR Parts 72 through 78)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If none apply, in Part C, list any that 'appear' to apply, but do not actually apply.
LLCAPCPRS Article 2, Section 27: Hazardous Air Pollutants - Maximum Achievable Control Technology (MACT)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If none apply, in Part C, list any that 'appear' to apply, but do not actually apply.
LLCAPCPRS Article 2, Section 28: MACT Emission Standards (40 CFR Part 63)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Describe compliance with each applicable MACT standard in Part B, below.



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SECTION 9: APPLICABLE RULES AND REQUIREMENTS

LLCAPCPRS Article 2, Section 32: Dust - Duty to Prevent the Escape Of	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using EPA Method 22.
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PART B: Applicable Federal Regulations and Additional Applicable LLCAPCPRS

If your source is subject to any federal air regulations set forth under 40 CFR Parts 60, 61, 63, 64, 68, 82, or Parts 72-78, or to additional regulations set forth in the LLCAPCPRS not included in Part A, then in the spaces provided below, list all of those regulations that apply to your source. For each regulation that applies to your source, list which emission unit(s) the rule applies to, and attach a brief explanation of how you intend to comply with the rule.

Regulation Name (e.g. NSPS for Grain Elevators)	Regulation Citation (e.g. 40 CFR 60 Subpart DD)	Emission unit(s) covered by this regulation.
NSPS General Provisions	40 CFR 60 Subpart A	Emission units 1, 2, and 3
NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	40 CFR 60 Subpart Dc	Emission units 1, 2, and 3
NESHAP General Provisions	40 CFR 63 Subpart A	Emission units 44-1 and 44-3
NESHAP MACT for Stationary RICE	40 CFR 63 Subpart ZZZZ	Emission units 44-1 and 44-3
Protection of Stratospheric Ozone	40 CFR 82	Entire Facility
NSPS for Spark Ignition Engines	40 CFR 60, Subpart JJJJ	44-3



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SECTION 9: APPLICABLE RULES AND REQUIREMENTS

PART C: Non-Applicable LLCAPCPRS Regulations & Non-Applicable Federal Regulations

For those regulations that would appear to apply to your source, but do not actually apply to your source, use the spaces provided below to provide the citation of the regulation, as well as the reason(s) that the regulation does not apply to your source.

Regulation Citation (e.g. 40 CFR 60 Subpart DD)	Provide the reason(s) the regulation does not apply to your source.
40 CFR 60, Subpart IIII	Engine installed in 1996, prior to applicability of rule
40 CFR 61	No applicable rules under this part
40 CFR 63, Subpart GGG	Rule applies only to major sources of HAPs, and GSK is an area source of HAPs
40 CFR 64	Rule applies only to major sources, and GSK is an area source of HAPs
40 CFR 68	GSK does not store any regulated chemicals above the threshold quantities as established under this rule
40 CFR 72	Rule applies only to major sources, and GSK is an area source of HAPs
40 CFR 73 thru 78	Not a regulated source for the Acid Rain program
40 CFR 63, Subpart JJJJJ	GSK is an area source and all boilers are gas fired



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SECTION 10: COMPLIANCE PLAN

Part A: Compliance Status for Applicable Rules and Requirements

Will your source be in compliance with all applicable rules and requirements identified in Section 9 of this application, including those that with compliance dates set to take place during the term of the permit?

- Yes
- No

Proceed to Application Checklist.

Part B: Applicable Rules and Requirements for Which Compliance Is Not Achieved or Will Not Be Achieved

Regulation Citation (e.g. 40 CFR 63 Subpart A)	Regulation Name (e.g. General Provisions)	Reason(s) why source will not be in compliance.



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TABLE 10-A: COMPLIANCE SCHEDULE

Applicable Requirement Name:		
Requirement Citation:		
Provide a narrative description of how compliance with this requirement will be achieved.		
Provide a detailed schedule for achieving compliance.		
Remedial Measures/Milestones		Date Expected
Applicable Requirement Name:		
Requirement Citation:		
Provide a narrative description of how compliance with this requirement will be achieved.		
Provide a detailed schedule for achieving compliance.		
Remedial Measures/Milestones		Date Expected
Applicable Requirement Name:		
Requirement Citation:		
Provide a narrative description of how compliance with this requirement will be achieved.		
Provide a detailed schedule for achieving compliance.		
Remedial Measures/Milestones		Date Expected



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APPLICATION COMPLETENESS CHECKLIST

Does this application contain confidential information?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes" are application pages containing confidential data clearly marked?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
---	--	---	--

Continue with the remainder of the checklist.

Will your source require a Class I (Title V) operating permit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--

Continue with the remainder of the checklist, and submit the original signed copy of the permit application when complete.

Section Number & Name	Included With Application?	If not included, provide reason.
Section 1: Administrative Information And Responsible Official Certification	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Section 2: Detailed Source Information	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 3-A: Emission Unit Identification	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 3-B: Stack / Release Point Information	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 4-A: Insignificant Activities List	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 4-B: Fuel Storage and Distribution Equipment Information	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 4-C: Insignificant Cooling Towers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable (N/A)
Table 5-A: Facility-Wide MPTE – Regulated Air Pollutant Emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 5-B: Facility-Wide MPTE – VOC Emissions from VOC-Containing Materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 5-C: Facility-Wide MPTE - HAP Emissions from HAP-Containing Materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 5-D: Maximum Potential to Emit and Operating Permit Thresholds	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Section 6: Determination Of Source Class	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 6-A: Source-Elected Throughput Limits and Emission Control Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 7-A: Facility-Wide APTE – Regulated Air Pollutant Emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 7-B: Facility-Wide APTE – VOC Emissions from VOC-Containing Materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 7-C: Facility-Wide APTE – HAP Emissions from HAP-Containing Materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Table 7-D: Actual Potential to Emit and Operating Permit Thresholds	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

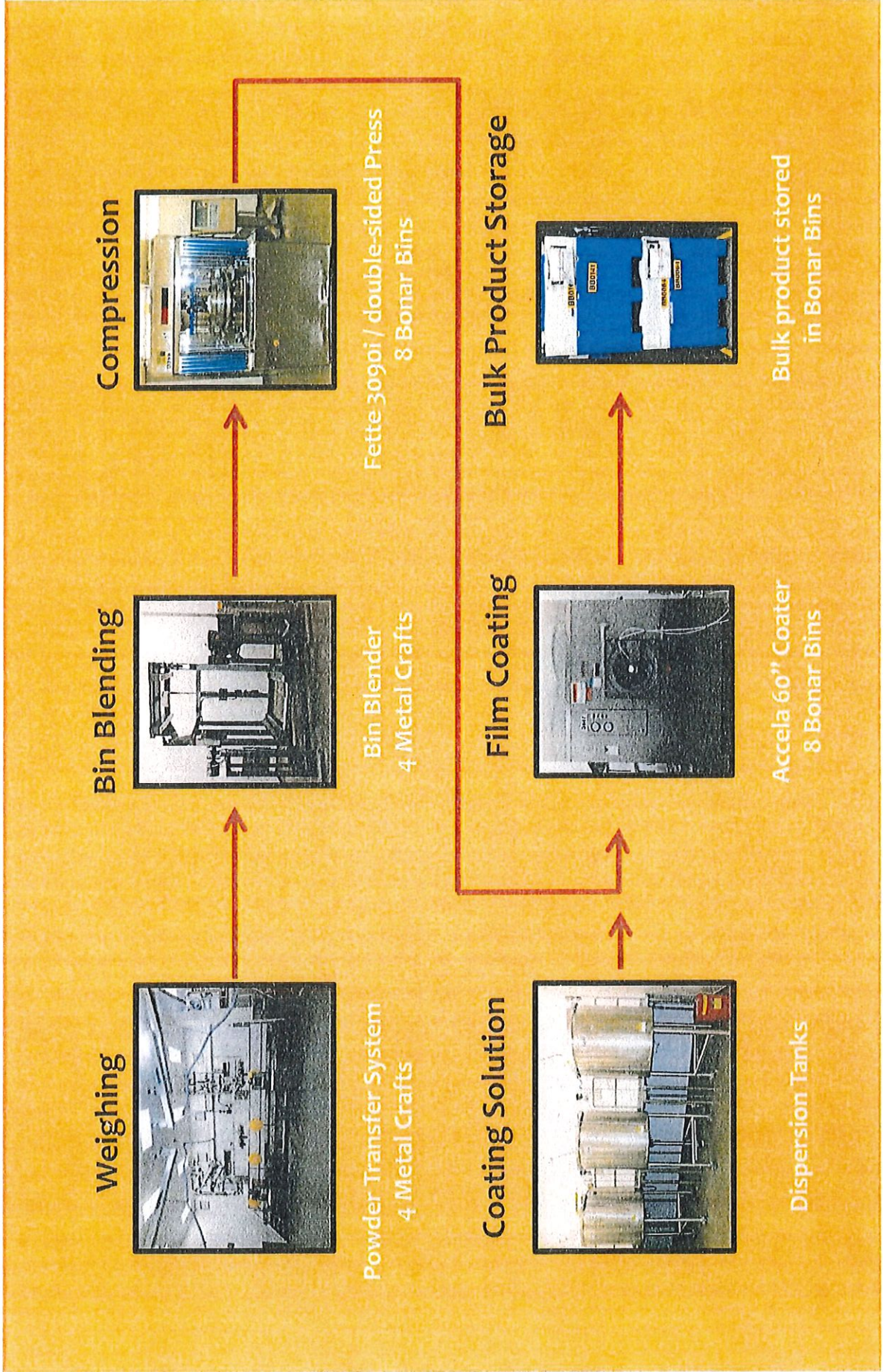


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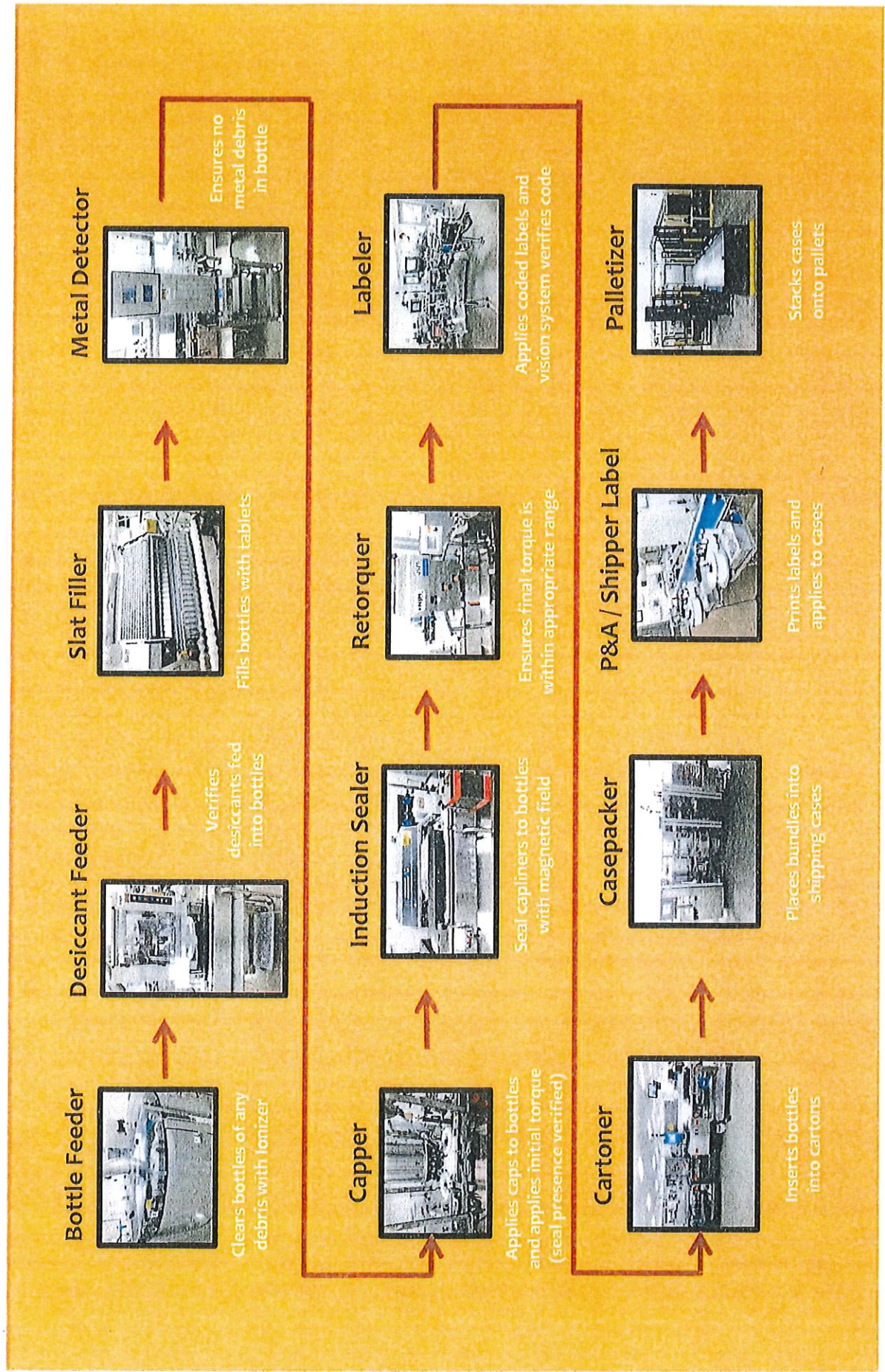
APPLICATION COMPLETENESS CHECKLIST

Section 8: Permit Shield	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A
Section 9: Applicable Rules And Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Section 10: Compliance Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A
Table 10-A: Compliance Schedule	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A

EXCEDRIN Mfg Process Flow NOVARTIS



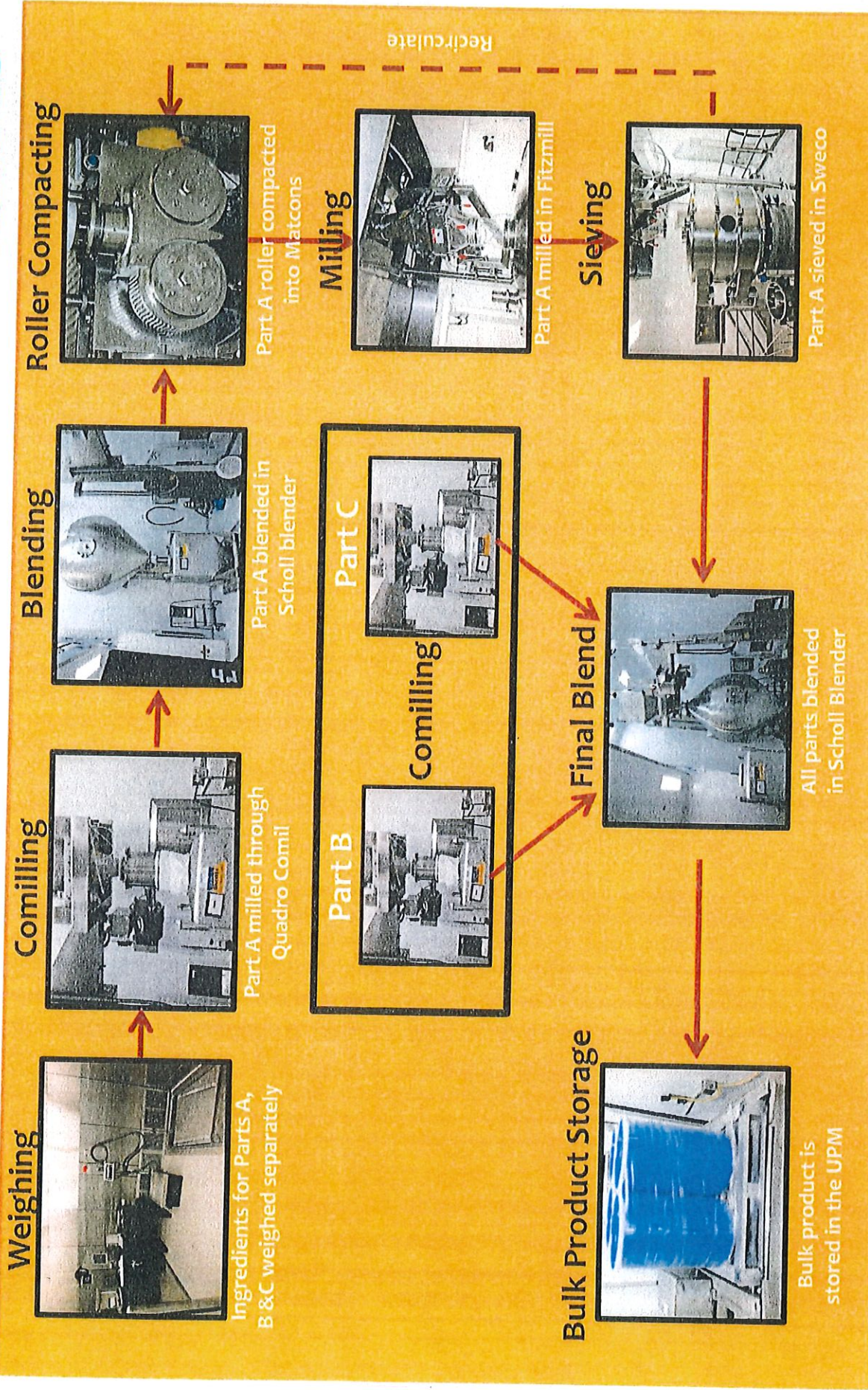
EXCEDRIN Pkg Process Flow NOVARTIS



THERAFLU Mfg Process Flow

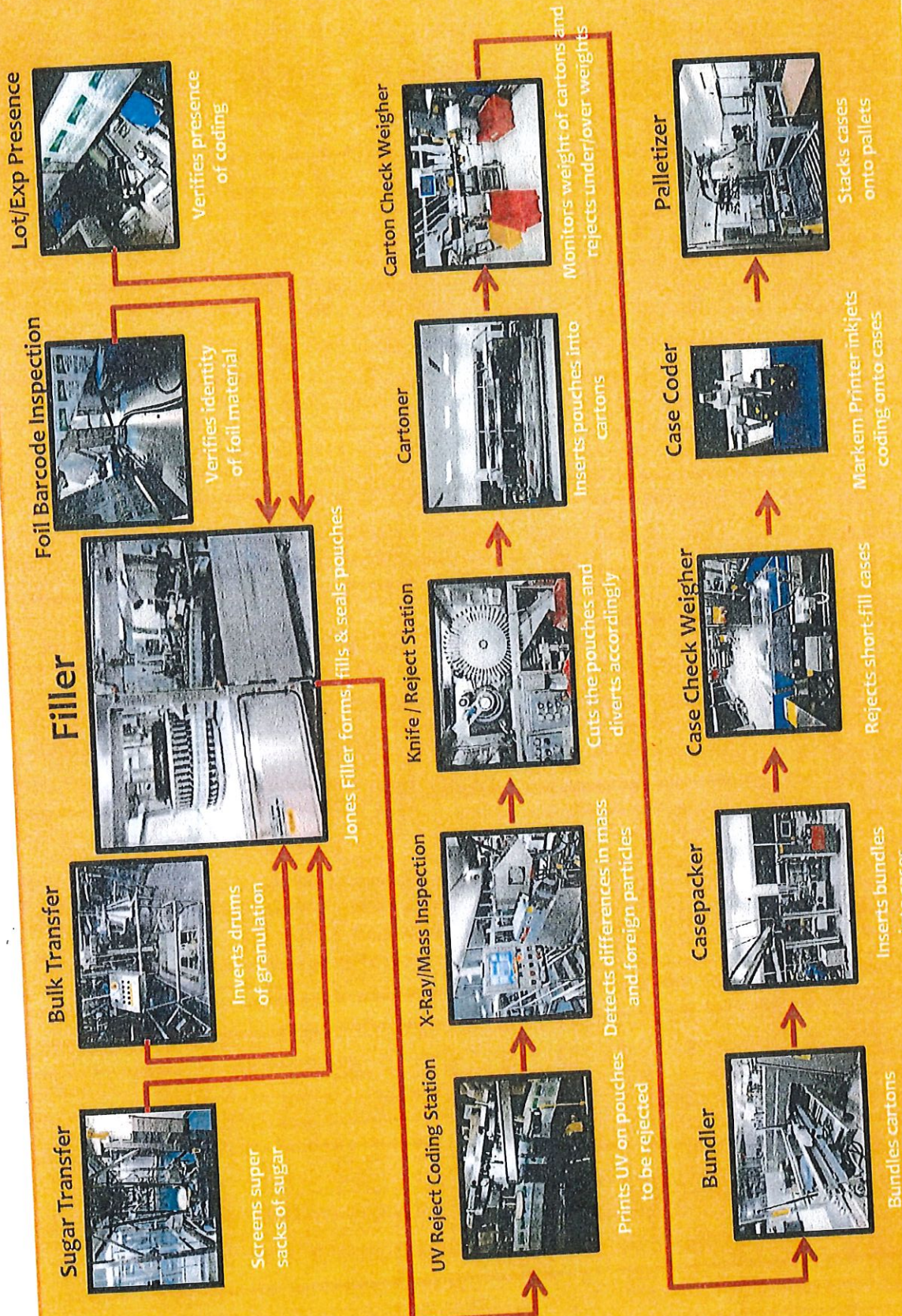


NOVARTIS





THERAFLU Pkg Process Flow





Legend

- Property Boundary

Date Prepared: 09/09/2022

Revision: 1.0

Title: GSK Consumer Health, Inc. DBA Haleon – Facility Location Map

Map Prepared By: **ARC**
Air Regulations Consulting, LLC



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SECTION 9: APPLICABLE RULES AND REQUIREMENTS

PART A: Applicable Requirements of the LLCAPCPRS

Applicable requirements for your source may include maintaining allowable stack opacity, maintaining allowable particulate emissions for the total given heat input, adhering to fugitive dust regulations, adhering to the process weight/particulate emissions rates, adhering to all construction permit conditions, etc. In the boxes below, check all of those requirements in the LLCAPCPRS that may apply to your source, and identify the method by which you intend to demonstrate compliance with the requirement. If a requirement does not apply to your source, briefly explain the reason it does not apply.

Requirement Citation & Name	Does standard apply?	If "Yes", describe compliance method. If "No", explain reason it does not apply.
LLCAPCPRS Article 2, Section 18: New Source Performance Standards (40 CFR Part 60)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Describe compliance with each applicable NSPS in Part B, below.
LLCAPCPRS Article 2, Section 19: Prevention of Significant Deterioration (PSD) of Air Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not a major source for PSD.
LLCAPCPRS Article 2, Section 20, paragraph (A)(1): Particulate Emission Stds. for Incinerators & Burn-Ovens	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Source does not have incinerators or burn-ovens.
LLCAPCPRS Article 2, Section 20, paragraph (B): Particulate Emission Stds. for Combustion Units >10,000 & <10 MMBtu	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No boilers greater than 10,000 MMBtu, and boilers under 10 MMBtu are insignificant.
LLCAPCPRS Article 2, Section 20, paragraph (C): Particulate Emission Stds. for Combustion Units <10,000 & >10 MMBtu	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using AP-42 emission factors (EF)
LLCAPCPRS Article 2, Section 20, paragraph (E): <20% Opacity of Visible Emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using EPA Methods 9 and 22.
LLCAPCPRS Article 2, Section 20, Table 20-1: Process Weight Rate Particulate Emission Stds.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using AP-42 EF and emission controls.
LLCAPCPRS Article 2, Section 21: Compliance Assurance Monitoring (CAM) (40 CFR Part 64)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Does not apply to Class II sources, but Class I sources must give explanation in Part C.
LLCAPCPRS Article 2, Section 22, paragraph (A)(14): Standards for Pathological Material Incinerators	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No pathological incinerators located at this source.
LLCAPCPRS Article 2, Section 22, paragraph (C): Standards for Air Curtain Incinerators	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No air curtain incinerators located at this source.
LLCAPCPRS Article 2, Section 23: Hazardous Air Pollutants - Emission Standards (40 CFR Part 61)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If none apply, in Part C, list any that 'appear' to apply, but do not actually apply.
LLCAPCPRS Article 2, Section 24: Sulfur Compound Emissions - Existing Sources - Emission Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using AP-42 EF.
LLCAPCPRS Article 2, Section 25: Nitrogen Oxides - Emission Standards for Existing Stationary Sources	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Source is not a nitric acid plant.
LLCAPCPRS Article 2, Section 26: Acid Rain (40 CFR Parts 72 through 78)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If none apply, in Part C, list any that 'appear' to apply, but do not actually apply.
LLCAPCPRS Article 2, Section 27: Hazardous Air Pollutants - Maximum Achievable Control Technology (MACT)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If none apply, in Part C, list any that 'appear' to apply, but do not actually apply.
LLCAPCPRS Article 2, Section 28: MACT Emission Standards (40 CFR Part 63)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Describe compliance with each applicable MACT standard in Part B, below.



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SECTION 9: APPLICABLE RULES AND REQUIREMENTS

LLCAPPRS Article 2, Section 32: Dust - Duty to Prevent the Escape Of	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance will be demonstrated using EPA Method 22.
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PART B: Applicable Federal Regulations and Additional Applicable LLCAPPRS

If your source is subject to any federal air regulations set forth under 40 CFR Parts 60, 61, 63, 64, 68, 82, or Parts 72-78, or to additional regulations set forth in the LLCAPPRS not included in Part A, then in the spaces provided below, list all of those regulations that apply to your source. For each regulation that applies to your source, list which emission unit(s) the rule applies to, and attach a brief explanation of how you intend to comply with the rule.

Regulation Name (e.g. NSPS for Grain Elevators)	Regulation Citation (e.g. 40 CFR 60 Subpart DD)	Emission unit(s) covered by this regulation.
NSPS General Provisions	40 CFR 60 Subpart A	Emission units 1, 2, and 3
NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	40 CFR 60 Subpart Dc	Emission units 1, 2, and 3
NESHAP General Provisions	40 CFR 63 Subpart A	Emission units 44-1 and 44-3
NESHAP MACT for Stationary RICE	40 CFR 63 Subpart ZZZZ	Emission units 44-1 and 44-3
Protection of Stratospheric Ozone	40 CFR 82	Entire Facility
NSPS for Spark Ignition Engines	40 CFR 60, Subpart JJJJ	44-3



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SECTION 9: APPLICABLE RULES AND REQUIREMENTS

PART B: Applicable NSPS, NESHAPs, MACT Standards, and Acid Rain Requirements (continued)

Regulation Name (e.g. NSPS for Grain Elevators)	Regulation Citation (e.g. 40 CFR 60 Subpart DD)	Emission unit(s) covered by this regulation.
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PART C: Non-Applicable LLCAPCPRS Regulations & Non-Applicable Federal Regulations

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