

RE: **BAYER HEALTHCARE 039-16552-00009**  
TO: Interested Parties / Applicant

February 3, 2003

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
Administrator, Christine Todd Whitman  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVPMOD.wpd 8/21/02

Mr. Robert A. Kania  
Bayer HealthCare LLC  
1884 Miles Avenue  
Elkhart, IN 46514-2282

February 3, 2003

Re: 039-16552  
Minor Source Modification to:  
Part 70 permit No.: T039-6628-00009

Dear Mr. Kania:

Bayer HealthCare LLC, formerly known as Bayer Corporation, was issued a Part 70 permit on March 27, 2002 for a source manufacturing pharmaceutical over-the-counter medications and reagent test strips for diagnostic purposes. A letter requesting changes to this permit was received on December 9, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

1. Two (2) natural gas-fired boilers, identified as Boilers No. 327-1-1 and 328-1-1, each with a maximum heat capacity of 12.6 mmBtu per hour, to be installed in June 2003, exhausting to Stack No. 327 and 328, respectively.
2. Two (2) natural gas-fired space heaters, identified as 329-1-1 and 330-1-1, and one (1) air make-up unit identified as 331-1-1, with a total maximum natural gas usage of 12,555 cubic feet per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868 or dial (317) 233-0868.

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

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cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Bayer HealthCare LLC  
1884 Miles Avenue  
Elkhart, Indiana 46514-2282**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

|   |                                    |
|---|------------------------------------|
| 1 <sup>st</sup> Minor Source Modification No.: 039-16552                                |                                    |
| Issued by: Original signed by<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date:<br>February 3, 2003 |

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates pharmaceutical manufacturing of over-the-counter medications and reagent test strips for diagnostic purposes.

|                              |   |
|------------------------------|---|
| Responsible Official:        | Robert A. Kania   |
| Source Address:              | 1884 Miles Avenue, Elkhart, IN 46514-2282   |
| Mailing Address:             | 1884 Miles Avenue, Elkhart, IN 46514-2282   |
| General Source Phone Number: | (574) 262-6502  |
| SIC Code:                    | 2834, 2835  |
| County Location:             | Elkhart   |
| Source Location Status:      | Attainment for all criteria pollutants  |
| Source Status:               | Part 70 Permit Program<br>Major Source, under PSD Rule;<br>Major Source, Section 112 of the Clean Air Act |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) Two (2) natural gas-fired boilers, identified as Boilers No. 327-1-1 and 328-1-1, each with a maximum heat capacity of 12.6 mmBtu per hour, to be installed in June 2003, exhausting to Stack No. 327 and 328, respectively.
- (2) Two (2) natural gas-fired space heaters, identified as 329-1-1 and 330-1-1, and one (1) air make-up unit identified as 331-1-1, with a total maximum natural gas usage of 12,555 cubic feet per hour (insignificant activities).

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

Utilities, consisting of:

- (a) One (1) natural gas fired boiler, identified as 301-1-1, with a maximum heat input of 198 million British thermal units per hour (MM Btu/hr), and exhausting to stack 301, (constructed in 1970)
- (b) One (1) natural gas fired boiler, identified as 302-1-1, with a maximum heat input of 198 MM Btu/hr, and exhausting to stack 302, (constructed in 1962)
- (c) One (1) natural gas fired boiler, identified as 303-1-1, with a maximum heat input of 54 MM Btu/hr, and exhausting to stack 303, (constructed in 1958)
- (d) Two (2) diesel fired generators, identified as 304-1-1 and 305-1-1, each with a maximum capacity of 3600 horsepower (HP), and exhausting to stacks 304 and 305, respectively. (constructed in 1987) (Insignificant Activities)
- (e) Two (2) natural gas-fired boilers, identified as Boilers No. 327-1-1 and 328-1-1, each with a maximum heat capacity of 12.6 mmBtu per hour, to be installed in June 2003, exhausting to Stack No. 327 and 328, respectively.
- (f) Two (2) natural gas-fired space heaters, identified as 329-1-1 and 330-1-1, and one (1) air make-up unit identified as 331-1-1, with a total maximum natural gas usage of 12,555 cubic feet per hour (insignificant activities).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3, the particulate matter (PM) emissions from the 198, 198, 54 million BTU/hour boilers, identified as 301-1-1, 302-1-1, and 303-1-1, shall be limited to 0.19 pounds/MMBTU heat input, respectively, for boilers constructed prior to June 8, 1972.

Pursuant to 326 IAC 6-2-3, the particulate matter (PM) emissions from each of the 12.6 million BTU/hour boilers, identified as 327-1-1 and 328-1-1, shall be limited to 0.22 pounds/MMBTU heat input, respectively, for boilers constructed after September 21, 1983.

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.3 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by

the Aresponsible official@ as defined by 326 IAC 2-7-1(34);

- (b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

Bayer HealthCare LLC  
Elkhart, Indiana  
Permit Reviewer: Holly M. Stockrahm

1<sup>st</sup> Minor Source Modification No.: 039-16552  
Modified By: Madhurima D. Moulik

Page 4 of 4  
OP. No. T039-6628-00009

D.1.4 New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc) - Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units.

Pursuant to 40 CFR 60.48c (Reporting and Recordkeeping Requirements), each of the two (2) 12.6 mmBtu/hr boilers is subject to the following:

The owner or operator shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) The annual capacity factor (the ratio between the actual heat input to a boiler from all fuels during a period of 12 consecutive calendar months and the potential heat input to the boiler had it been operating for 8760 hours during a calendar year at the maximum steady state design heat input capacity) at which the owner or operator anticipates operating the affected facility based on all the fuels fired and based on each individual fuel fired.
- (3) The owner or operator of each boiler shall record and maintain records of the amounts of each fuel combusted during each day.
- (4) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

**February 3, 2003**

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Minor Source Modification and a  
Minor Permit Modification to a Part 70 Operating Permit**

**Source Background and Description**

|  |  |
|--|--|
| <b>Source Name:</b>                    | <b>Bayer HealthCare LLC</b>                      |
| <b>Source Location:</b>                | <b>1884 Miles Avenue, Elkhart, IN 46514-2282</b> |
| <b>County:</b>                         | <b>Elkhart</b>                                   |
| <b>SIC Code:</b>                       | <b>2834</b>                                      |
| <b>Operation Permit No.:</b>           | <b>T039-6628-00009</b>                           |
| <b>Operation Permit Issuance Date:</b> | <b>March 27, 2002</b>                            |
| <b>Source Modification No.:</b>        | <b>039-16552</b>                                 |
| <b>Permit Modification No.:</b>        | <b>039- 16959</b>                                |
| <b>Permit Reviewer:</b>                | <b>Madhurima D. Moulik</b>                       |

The Office of Air Quality (OAQ) has reviewed a modification application from Bayer HealthCare LLC, formerly known as Bayer Corporation, relating to the pharmaceutical manufacturing of over-the-counter medications and reagent test strips for diagnostic purposes.

**History**

On January 7, 1998, Bayer HealthCare LLC, formerly known as Bayer Corporation, submitted an application to the OAQ requesting to add two (2) boilers, two (2) space heating units and one (1) make-up air unit to their existing plant. Bayer Corporation was issued a Part 70 permit on March 27, 2002. Bayer HealthCare LLC also requested the deletion of all emission units included in Section D.1 of the permit, which have ceased operation, or will be shut down as of December 31, 2002. On December 23, 2002, the source submitted an application for changing the source name to Bayer HealthCare LLC, and other source data.

**New Emission Units and Pollution Control Equipment**

The source consists of the following new facilities/units

- (a) Two (2) natural gas-fired boilers, identified as Boilers No. 327-1-1 and 328-1-1, each with a maximum heat capacity of 12.6 mmBtu per hour, to be installed in June 2003, exhausting to Stack No. 327 and 328, respectively.
- (b) Two (2) natural gas-fired space heaters, identified as 329-1-1 and 330-1-1, and one (1) air make-up unit identified as 331-1-1, with a total maximum natural gas usage of 12,555 cubic feet per hour.

**Existing Approvals**

The source was issued a Part 70 Operating Permit T039-6628-00009 on March 27, 2002.

### Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 9, 2002.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations.

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

| Pollutant       | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM              | 1.3                           |
| PM-10           | 1.3                           |
| SO <sub>2</sub> | 0.6                           |
| VOC             | 0.9                           |
| CO              | 13.9                          |
| NO <sub>x</sub> | 16.6                          |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

### Justification for Modification

The potential to emit of NO<sub>x</sub> of the new emission units is 16.6 tons per year. Therefore, pursuant to 326 IAC 2-7-10.5(d)(4)(B)(ii), a Minor Source Modification will be issued. According to 326 IAC 2-7-12(b)(B), a Minor Permit Modification can be used for permit changes that “do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit”. The requested changes meet the above requirement, therefore a Minor Permit Modification will be issued.

### County Attainment Status

The source is located in Elkhart County.

| Pollutant       | Status      |
|-----------------|-------------|
| PM-10           | attainment  |
| SO <sub>2</sub> | attainment  |
| NO <sub>2</sub> | attainment  |
| Ozone           | maintenance |
| CO              | attainment  |

|      |            |
|------|------------|
| Lead | attainment |
|------|------------|

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

#### **Federal Rule Applicability**

- (a) The two (2) new boilers identified as 327-1-1 and 328-1-1, each with maximum heat input capacities of 12.6 mmBtu per hour, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc) - Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units.

Pursuant to 40 CFR 60.48c (Reporting and Recordkeeping Requirements), each of the two (2) boilers is subject to the following:

The owner or operator shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
  - (2) The annual capacity factor (the ratio between the actual heat input to a boiler from all fuels during a period of 12 consecutive calendar months and the potential heat input to the boiler had it been operating for 8760 hours during a calendar year at the maximum steady state design heat input capacity) at which the owner or operator anticipates operating the affected facility based on all the fuels fired and based on each individual fuel fired.
  - (3) The owner or operator of each boiler shall record and maintain records of the amounts of each fuel combusted during each day.
  - (4) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to the two (2) boilers or two (2) space heaters and one (1) air make-up unit.

#### **State Rule Applicability - Entire Source**

The state rule applicability of the entire source remains unchanged from that determined in Part 70 permit no. T039-6628-00009.

#### **State Rule Applicability - Individual Facilities**

326 IAC 6-3-2 (Process Operations)

Sources of indirect heating are exempt from this rule. Therefore, 326 IAC 6-3-2 does not apply to any of the new boilers to be installed at the facility.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect heating: Emission Limitations for facilities specified in 326 IAC 6-2-1(d))

Pursuant to 326 IAC 6-2-4, particulate emissions from boilers constructed after September 21, 1983, shall be limited by the following:

$$Pt = 1.09/ Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input = 475.2 mmBtu/hr

Therefore, Pt = 0.22 lb/mmBtu

For each 12.6 mmBtu per hour boiler, the PM emission is limited to 2.77 lb/hr = 12.14 tons per year. The potential to emit of PM from each boiler is less than this limit. Therefore, the two (2) boilers are in compliance with this rule.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to the two (2) new boilers at this time.

### Conclusion

The operation of this source shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-16522-00009.

### CHANGES TO PART 70 PERMIT

The following are the changes to the Part 70 permit (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section A.1 is modified as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates pharmaceutical manufacturing of over-the-counter medications and reagent test strips for diagnostic purposes.

Responsible Official: Robert A. Kania  
Source Address: 1884 Miles Avenue, Elkhart, IN 46514-2282  
Mailing Address: P.O. Box 40, Elkhart, IN 46514-2282 **1884 Miles Avenue,  
Elkhart, IN 46514-2282**  
General Source Phone Number: (574) ~~264-8111~~ **262-6502**  
SIC Code: 2834, 2835  
County Location: Elkhart  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rule;  
Major Source, Section 112 of the Clean Air Act

(2) Section A.2 is modified to delete the emission units that are no longer in operation:

~~The Consumer Care Division (CCD) for the production of over-the-counter medicines (constructed in 1994), consisting of:~~

- ~~(1) Central Weighing Center, identified as 101-1-1, using a HEPA filter as control, and exhausting to stack 101;~~
- ~~(2) Sodium Bicarbonate Storage Silo, identified as 104-1-1, using a bin vent filter as control, and exhausting to stack 104;~~
- ~~(3) Sodium Bicarbonate Receiver/Vacuum Blower, identified as 105-1-1, using a filter receiver and baghouse as control, and exhausting to stack 105;~~
- ~~(4) Sodium Bicarbonate Conveyors/Bin, identified as 106-1-1, using a fabric filter as control, and exhausting to stack 106;~~
- ~~(5) Huhn Dryer #1, Huhn Dryer #2, identified as 107-1-1 and 107-2-1, using a wet scrubber as control, and exhausting to stack 107;~~
- ~~(6) Alka-Seltzer Compounding (XP), identified as 108-1-1, using a baghouse as control, and exhausting to stack 108;~~
- ~~(7) Alka-Seltzer Compounding (Non-XP), identified as 109-1-1, using a baghouse as control, and exhausting to stack 109;~~
- ~~(8) Alka-Seltzer Compounding (East), identified as 110-1-1, using a baghouse as control, and exhausting to stack 110;~~
- ~~(9) Alka-Seltzer Compression Lines - 8 (East and West), identified as 111-1-1, using a baghouse as control, with no exhaust;~~
- ~~(10) Tablet Compounding - Process Vent, identified as 114-1-1, using a baghouse as control, and exhausting to stack 114;~~
- ~~(11) Vitamin Compounding, identified as 115-1-1, using a baghouse as control, and exhausting to stack 115;~~
- ~~(12) Tablet Compression Lines (5), identified as 127-1-1, using a baghouse as control, and exhausting to stack 127;~~

(b-a) .....

(b e) Utilities, consisting of:

- (1) One (1) natural gas fired boiler, identified as 301-1-1, with a maximum heat input of 198 million British thermal units per hour (MM Btu/hr), and exhausting to stack 301, (constructed in 1970)
- (2) One (1) natural gas fired boiler, identified as 302-1-1, with a maximum heat input of 198 MM Btu/hr, and exhausting to stack 302, (constructed in 1962)
- (3) One (1) natural gas fired boiler, identified as 303-1-1, with a maximum heat input of 54 MM Btu/hr, and exhausting to stack 303, (constructed in 1958)
- (4) **Two (2) natural gas-fired boilers, identified as Boilers No. 327-1-1 and 328-1-1, each with a maximum heat capacity of 12.6 mmBtu per hour, to be installed in June 2003, exhausting to Stack No. 327 and 328, respectively.**
- (5) **Two (2) natural gas-fired space heaters, identified as 329-1-1 and 330-1-1, and one (1) air make-up unit identified as 331-1-1, with a total maximum natural gas usage of 12,555 cubic feet per hour (insignificant activities).**

(3) The entire section D.1 is deleted from the permit.

(4) The facility description in Section D.3 is modified as follows:

Facility Description [326 IAC 2-7-5(15)]:

Utilities, consisting of:

- (a) One (1) natural gas fired boiler, identified as 301-1-1, with a maximum heat input of 198 million British thermal units per hour (MM Btu/hr), and exhausting to stack 301, (constructed in 1970)
- (b) One (1) natural gas fired boiler, identified as 302-1-1, with a maximum heat input of 198 MM Btu/hr, and exhausting to stack 302, (constructed in 1962)
- (c) One (1) natural gas fired boiler, identified as 303-1-1, with a maximum heat input of 54 MM Btu/hr, and exhausting to stack 303, (constructed in 1958)
- (d) Two (2) diesel fired generators, identified as 304-1-1 and 305-1-1, each with a maximum capacity of 3600 horsepower (HP), and exhausting to stacks 304 and 305, respectively. (constructed in 1987) (Insignificant Activities)
- (e) **Two (2) natural gas-fired boilers, identified as Boilers No. 327-1-1 and 328-1-1, each with a maximum heat capacity of 12.6 mmBtu per hour, to be installed in June 2003, exhausting to Stack No. 327 and 328, respectively.**
- (f) **Two (2) natural gas-fired space heaters, identified as 329-1-1 and 330-1-1, and one (1) air make-up unit identified as 331-1-1, with a total maximum natural gas usage of 12,555 cubic feet per hour (insignificant activities).**

(5) Section D.3.1 is modified as follows:

D.3.1 Particulate Matter Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3, the particulate matter (PM) emissions from the 198, 198, 54 million BTU/hour boilers, identified as 301-1-1, 302-1-1, and 303-1-1, shall be limited to 0.19 pounds/MMBTU heat input, respectively, for boilers constructed prior to June 8, 1972.

**Pursuant to 326 IAC 6-2-3, the particulate matter (PM) emissions from each of the 12.6 million BTU/hour boilers, identified as 327-1-1 and 328-1-1, shall be limited to 0.22 pounds/MMBTU heat input, respectively, for boilers constructed after September 21, 1983.**

(6) Section D.3.4 is added to the permit (Reporting and Record Keeping Requirements):

**D.3.4 New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc) - Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units.**

**Pursuant to 40 CFR 60.48c (Reporting and Recordkeeping Requirements), each of the two (2) 12.6 mmBtu/hr boilers is subject to the following:**

**The owner or operator shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup. This notification shall include:**

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.**
- (2) The annual capacity factor (the ratio between the actual heat input to a boiler from all fuels during a period of 12 consecutive calendar months and the potential heat input to the boiler had it been operating for 8760 hours during a calendar year at the maximum steady state design heat input capacity) at which the owner or operator anticipates operating the affected facility based on all the fuels fired and based on each individual fuel fired.**
- (3) The owner or operator of each boiler shall record and maintain records of the amounts of each fuel combusted during each day.**
- (4) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.**

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: Bayer HealthCare LLC**

**Address City IN Zip: 1884 Miles Ave., Elkhart, IN 46514-2282**

**MSM No. : 039-16552-00009**

**MPM No.: 039-16959-00009**

**Reviewer: Madhurima D. Moulik**

**Date: December 27, 2002**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

37.8

331.1

**Pollutant**

|                               | PM* | PM10* | SO2 | NOx                  | VOC | CO   |
|-------------------------------|-----|-------|-----|----------------------|-----|------|
| Emission Factor in lb/MMCF    | 1.9 | 7.6   | 0.6 | 100.0<br>**see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.3 | 1.3   | 0.1 | 16.6                 | 0.9 | 13.9 |

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**HAPs Emissions**

**Company Name: Bayer Corporation**

**Address City IN Zip: 1884 Miles Ave., Elkhart, IN 46514-2282**

**MSM No. : 039-16552-00009**

**MPM No.: 039-16959-00009**

**Reviewer: Madhurima D. Moulik**

**Date: December 27, 2002**

**HAPs - Organics**

|                               | Benzene   | Dichlorobenzene | Formaldehyde | Hexane    | Toluene   |
|-------------------------------|-----------|-----------------|--------------|-----------|-----------|
| Emission Factor in lb/MMcf    | 2.1E-03   | 1.2E-03         | 7.5E-02      | 1.8E+00   | 3.4E-03   |
| Potential Emission in tons/yr | 3.477E-04 | 1.987E-04       | 1.242E-02    | 2.980E-01 | 5.629E-04 |

**HAPs - Metals**

|                               | Lead      | Cadmium   | Chromium  | Manganese | Nickel    |
|-------------------------------|-----------|-----------|-----------|-----------|-----------|
| Emission Factor in lb/MMcf    | 5.0E-04   | 1.1E-03   | 1.4E-03   | 3.8E-04   | 2.1E-03   |
| Potential Emission in tons/yr | 8.278E-05 | 1.821E-04 | 2.318E-04 | 6.291E-05 | 3.477E-04 |

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.