

**February 12, 2003**

Mr. Patrick T. Hastings  
Bayer HealthCare LLC  
P. O. Box 40  
Elkhart, IN 46515-0040

Re: 039-16959  
First Minor Permit Modification to  
Part 70 No.: T 039-6628-00009

Dear Mr. Hastings:

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 the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document and Addendum.

The modification consists of the addition of emission units to the source, and the removal of pre-existing emission units. In addition, the name of the source has also been changed from Bayer Corporation to Bayer HealthCare LLC.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

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, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (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

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

**Attachments**

mm

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.

Operation Permit No.: T039-6628-00009	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 27, 2002  Expiration Date: March 27, 2007

Minor Permit Modification No.: 039-16959	Pages Modified: 4-7, 29-32, 36, 36a, 37
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:February 12, 2003

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

D.3.3 Reporting Requirements

**D.4 FACILITY OPERATION CONDITIONS - Insignificant Activity . . . . . 37**

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

D.4.1 Particulate Matter Emissions Limitations [326 IAC 6-3-2]

<b>Certification . . . . .</b>	<b>38</b>
<b>Emergency Occurrence Report . . . . .</b>	<b>39</b>
<b>Semi-Annual Natural Gas Fired Boiler Certification . . . . .</b>	<b>41</b>
<b>Quarterly Deviation and Compliance Monitoring Report . . . . .</b>	<b>42</b>

## 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:	Patrick T. Hastings
Source Address:	1884 Miles Avenue, Elkhart, IN 46514-2282
Mailing Address:	P. O. Box 40, Elkhart, IN 46515-0040
General Source Phone Number:	(574) 262-6502
SIC Code:	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

### 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:

- (a) The Diagnostics Division for the production of reagent test strips (constructed in 1987),
  - (1) Reactors/receivers (North), identified as 450-1-1, using a condenser as VOC control, and exhausting to stack 450,
  - (2) Reactors/receivers (South), identified as 451-1-1, using two condensers as VOC control, and exhausting to stack 451,
  - (3) Steam Jet Vacuum System, identified as 453-1-1, using four condensers, 453-1-1 to 453-4-1, as VOC control, and exhausting to stack 453,
- (b) 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.

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

Minor Permit Modification No.: 039-16959  
Modified By: Madhurima D. Moulik

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- (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).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (b) Paved and unpaved roads and parking lots. (326 IAC 6-4)

A.4 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);

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

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## SECTION D.3

## 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.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.

#### D.3.2 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.3.3 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 responsible 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

Minor Permit Modification No.: 039-16959  
Modified By: Madhurima D. Moulik

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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.

## **SECTION D.4 FACILITY OPERATION CONDITIONS**

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

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)

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

#### **D.4.1 Particulate Matter Limitations [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the

- (a) brazing equipment, cutting torches, soldering equipment, shall not exceed 0.55 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.
- (b) welding equipment shall not exceed 0.55 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

# Indiana Department of Environmental Management

## Office of Air Quality

### Addendum to the Technical Support Document for Minor Permit Modification to Part 70 Permit

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

On January 10, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Bayer HealthCare LLC had applied for a Minor Permit Modification to Part 70 permit no. T039-6628-00009. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 21, 2003, Bayer HealthCare LLC submitted comments on the proposed Minor Permit Modification. The summary of the comments and corresponding responses is as follows (~~strikeout~~ to show deletions and **bold** to show additions):

#### Comment:

Change the facility Responsible Official name, facility mailing address, and SIC code in Section A.1. All activities associated with SIC code 2834 has been removed from the facility. The Director of Site Services, Patrick T. Hastings is to be named as the Responsible Official.

#### Response:

Mr. Patrick T. Hastings, Director of Site Services, meets the definition of "Responsible Official" as defined in 326 IAC 2-7-1(34). Section A.1 is modified as follows:

Responsible Official:	<del>Robert A. Kania</del> <b>Patrick T. Hastings</b>
Source Address:	1884 Miles Avenue, Elkhart, IN 46514-2282
Mailing Address:	<del>1884 Miles Avenue, Elkhart, IN 46514-2282</del> <b>P. O. Box 40, Elkhart, IN 46515-0040</b>
General Source Phone Number:	(574) 262-6502
SIC Code:	<del>2834</del> , 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

#### Comment:

Delete Insignificant activities identified as 203-1-1 (Sand Blasting Room) and 201-1-1 (Paint Spray

booth) which are no longer in operation. In addition, paved and unpaved roads at the source no longer have public access.

Bayer HealthCare LLC  
Elkhart, Indiana

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Response:

Section A.3 is modified as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

~~(a) Sand Blasting Room, identified as 203-1-1, (6-3)~~

(a b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)

~~(b) Paint Spray Booth, identified as 201-1-1, (326 IAC 6-3)~~

(b d) Paved and unpaved roads and parking lots ~~with public access.~~ (326 IAC 6-4)

Section D.4 is modified as follows:

Facility Description [326 IAC 2-7-5(15)]:  
~~Sand Blasting Room, identified as 203-1-1, (326 IAC 6-3)~~

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)

~~Paint Spray Booth, identified as 201-1-1, (326 IAC 6-3)~~

Section D.4.1 is modified as follows:

D.4.1 Particulate Matter Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the  
(a) ~~sand blast room~~ and brazing equipment, cutting torches, soldering equipment, shall not exceed 0.55 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

(b) welding equipment shall not exceed 0.55 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

~~(c) the Paint Spray Booth shall be limited by the following equation:~~

~~Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be~~

accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

Bayer HealthCare LLC  
Elkhart, Indiana

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Sections D.4.2 and D.4.3 are deleted:

~~D.4.2—VOC~~

~~Any change or modification which may increase the potential VOC emissions to fifteen (15) pounds or more per day from the spray paint booth, identified as 201-1-1, must be approved by the Office of Air Quality (OAQ) before such change may occur.~~

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

~~D.4.3—Record Keeping~~

~~To document compliance with Condition D.4.2, the Permittee shall keep records of VOC input to the spray paint booth, identified as 201-1-1.~~

The Table of Contents is modified as follows:

D.4	FACILITY OPERATION CONDITIONS - Insignificant Activity . . . . .	37
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.4.1	Particulate Matter Emissions Limitations [326 IAC 6-3-2]	
<del>D.4.2</del>	<del>VOC</del>	
<del>D.4.3</del>	<del>Record Keeping Requirements</del>	



## **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
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- (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 Permit Modification No.: 039-16959-00009.

### 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,~~

- (c) 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/hrPotential Throughput  
MMCF/yr

37.8

331.1

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
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.

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**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**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 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**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 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.