



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 18, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Eli Lilly & Company / 063-19057-00053

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar 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 considerations 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.

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.

Enclosures  
FNPER.dot 9/16/03



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**NEW SOURCE CONSTRUCTION PERMIT  
AND MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Eli Lilly and Company Distribution Facility  
Airwest Business Park, Stanley Road  
Plainfield, Indiana 46168**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (326 IAC 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 063-19057-00053	
Issued by: Original signed by  Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 18, 2004  Expiration Date: October 18, 2009

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## 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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary pharmaceutical distribution facility.

Authorized Individual:	Manager, Distribution
Source Address:	Airwest Business Park, Stanley Road, Plainfield, Indiana 46168
Mailing Address:	Lilly Corporate Center, D.C. 5204, Indianapolis, Indiana 46285
General Source Phone:	(317) 276-3339
SIC Code:	2834
County Location:	Hendricks
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Two (2) natural gas fired boilers, identified as #1 and #2, using No. 2 fuel oil as back fuel, each with a maximum heat input capacity of 8.5 MMBtu/hr, and exhausting through one (1) common stack.
- (b) One (1) diesel fired emergency generator, identified as #EG-1, with a maximum power output of 2,922 horsepower and a maximum operating hours of 500 hrs/yr, and exhausting through stack EG-1.
- (c) One (1) diesel fired fire pump, identified as #DFP-1, with a maximum power output of 240 horsepower and a maximum operating hours of 500 hrs/yr, and exhausting through stack DFP-1.
- (d) One (1) fuel oil storage tank, identified as TK-1, with a maximum capacity of 10,000 gallons.
- (e) One (1) diesel storage tank, identified as TK-EGS-1, with a maximum capacity of 3,000 gallons.
- (f) One (1) diesel storage tank, identified as TK-DFP-1, with a maximum capacity of 350 gallons.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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This permit 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.

### **B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

### **B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.6 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.7 Minor Source Operating Permit [326 IAC 2-6.1]**

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This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 or 326 IAC 2-3 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

**B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.13 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.6 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing

shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

### **Compliance Monitoring Requirements**

#### **C.7 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### **Record Keeping and Reporting Requirements**

#### **C.9 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

#### **C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (a) Two (2) natural gas fired boilers, identified as #1 and #2, using No. 2 fuel oil as back fuel, each with a maximum heat input capacity of 8.5 MMBtu/hr, and exhausting through one (1) common stack.

(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 2-6.1]

#### D.1.1 PM Emissions [326 IAC 6-2-4]

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Pursuant to 326 IAC 6-2-4(a) (PM Emissions for Sources of Indirect Heating), PM emissions from each of the boilers #1 and #2 shall not exceed 0.52 lbs/MMBtu.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (b) One (1) diesel fired emergency generator, identified as #EG-1, with a maximum power output of 2,922 horsepower and a maximum operating hours of 500 hrs/yr, and exhausting through stack EG-1.
- (c) One (1) diesel fired fire pump, identified as #DFP-1, with a maximum power output of 240 horsepower and a maximum operating hours of 500 hrs/yr, and exhausting through stack DFP-1.
- (d) One (1) fuel oil storage tank, identified as TK-1, with a maximum capacity of 10,000 gallons.
- (e) One (1) diesel storage tank, identified as TK-EGS-1, with a maximum capacity of 3,000 gallons.
- (f) One (1) diesel storage tank, identified as TK-DFP-1, with a maximum capacity of 350 gallons.

(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 2-6.1]

There are no specifically applicable requirements for these units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Eli Lilly and Company Distribution Facility</b>
<b>Address:</b>	<b>Airwest Business Park, Stanley Road</b>
<b>City:</b>	<b>Plainfield, Indiana 46168</b>
<b>Phone #:</b>	<b>(317) 276-3339</b>
<b>MSOP #:</b>	<b>063-19057-00053</b>

I hereby certify that Eli Lilly and Company Distribution Facility is  still in operation.  
 no longer in operation.

I hereby certify that Eli Lilly and Company Distribution Facility is  in compliance with the requirements of MSOP 063-19057-00053  
 not in compliance with the requirements of MSOP 063-19057-00053

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_        \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_        \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

**Addendum to the Technical Support Document  
for a New Source Review and Minor Source Operating Permit**

**Source Background and Description**

Source Name:	Eli Lilly and Company Distribution Facility
Source Location:	Airwest Business Park, Stanley Road, Plainfield, Indiana
46168 County:	Hendricks
SIC Code:	2834
Operation Permit No.:	063-19057-00053
Permit Reviewer:	ERG/YC

On August 30, 2004, the Office of Air Quality (OAQ) had a notice published in the Hendricks County Flyer, Avon, Indiana, stating that Eli Lilly and Company Distribution Facility had applied for a Minor Source Operating Permit relating to the construction and operation of a pharmaceutical distribution facility. The notice also stated that OAQ proposed to issue a permit for this operation 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. "Pounds" and "Hour" were capitalized in Condition C.1.  

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C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) ~~p~~**Pounds per h**~~Hour~~ [40 CFR 52 Subpart P][~~326 IAC 6-3-2~~]

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2. Clarification has been added to C.22 (e) to more fully explain the definition of "calendar year".  

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C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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...

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years **unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**

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

**Technical Support Document (TSD) for a New Source Construction  
and Minor Source Operating Permit**

**Source Background and Description**

Source Name:	Eli Lilly and Company Distribution Facility
Source Location:	Airwest Business Park, Stanley Road, Plainfield, Indiana 46168
County:	Hendricks
SIC Code:	2834
Operation Permit No.:	063-19057-00053
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from Eli Lilly and Company Distribution Facility relating to the construction and operation of a pharmaceutical distribution facility.

**Permitted Emission Units and Pollution Control Equipment**

There are no permitted emissions units or control equipment at this source.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

**New Emission Units and Pollution Control Equipment**

The source consists of the following new emission units and pollution control equipment:

- (a) Two (2) natural gas fired boilers, identified as #1 and #2, using No. 2 fuel oil as back fuel, each with a maximum heat input capacity of 8.5 MMBtu/hr, and exhausting through one (1) common stack.
- (b) One (1) diesel fired emergency generator, identified as #EG-1, with a maximum power output of 2,922 horsepower and a maximum operating hours of 500 hrs/yr, and exhausting through stack EG-1.
- (c) One (1) diesel fired fire pump, identified as #DFP-1, with a maximum power output of 240 horsepower and a maximum operating hours of 500 hrs/yr, and exhausting through stack DFP-1.
- (d) One (1) fuel oil storage tank, identified as TK-1, with a maximum capacity of 10,000 gallons.
- (e) One (1) diesel storage tank, identified as TK-EGS-1, with a maximum capacity of 3,000 gallons.
- (f) One (1) diesel storage tank, identified as TK-DFP-1, with a maximum capacity of 350 gallons.

### Existing Approvals

This is the first air approval issued to this source.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Common Stack	Boilers #1 and #2	56	3.0	1,541-1,576	360-400
EG-1	Emergency Generator	10	0.83	16,200	895
DFP-1	Diesel Fired Pump	14	0.33	1,000	700
TK-1	Storage Tank	10	2.0	N/A	Ambient
TK-EGS-1	Storage Tank	10	2.0	N/A	Ambient
TK-DFP-1	Storage Tank	14	2.0	N/A	Ambient

### Recommendation

The staff recommends to the Commissioner that the construction and operation 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 May 3, 2004. Additional information was received on June 7, 2004 and August 13, 2004.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

### Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	1.70
PM10	1.70
SO <sub>2</sub>	40.9
VOC	2.08
CO	10.7
NO <sub>x</sub>	30.0

HAPs	Potential to Emit (tons/yr)
Total	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO<sub>2</sub> and NO<sub>x</sub> is greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (e) Fugitive Emissions  
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

**County Attainment Status**

The source is located in Hendricks County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Hendricks County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Hendricks County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
 Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD.

**Source Status**

New Source PSD and Nonattainment NSR Definition (based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	1.70
PM-10	1.70
SO <sub>2</sub>	40.9

Pollutant	Emissions (tons/yr)
VOC	2.08
CO	10.7
NO <sub>x</sub>	30.0
Combination HAPs	Negligible

- (a) This new source is not a Nonattainment NSR major stationary source because no nonattainment pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment NSR requirements do not apply.
- (b) This new source is not a PSD major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) These emissions are based on the potential to emit of this source (see Appendix A).

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The New Source Performance Standards for Small Industrial - Commercial - Institutional Steam generating Units (326 IAC 12, 40 CFR 60.40c-48c, Subpart Dc) are not included in this permit. The boilers at this source have maximum heat inputs less than 10 MMBtu/hr.
- (c) The New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb) are not included in this permit. The diesel storage tanks at this source have capacities less than 75 cubic meters (19,813 gallons).
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (e) The National Emission Standards for Hazardous Air Pollutants - Industrial/Commercial/Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD) are not included in this permit. This source is not a major source for HAPs
- (f) The National Emission Standards for Hazardous Air Pollutants for Pharmaceuticals Production (40 CFR 63, Subpart GGG) are not included in this permit. This source is a distribution facility and does not manufacture pharmaceutical products

- (g) The National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) are not included in this permit. This source is not a major source for HAPs.

### State Rule Applicability – Entire Source

#### 326 IAC 2-1.1-5 (Nonattainment NSR)

This source is located in Hendricks County, which has been designated as a nonattainment area for the 8-hour Ozone standard in June 2004. The potential to emit VOC and NO<sub>x</sub> of this source is each less than 100 tons/yr. Therefore, this source is a minor source under Nonattainment NSR.

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This new source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and the potential to emit of PM, PM<sub>10</sub>, SO<sub>2</sub>, and CO is less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

#### 326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The potential to emit HAPs from this new entire source is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Hendricks County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year (i.e., does not require a Part 70 Permit). Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 8-5-3 (Synthesized Pharmaceutical Manufacturing Operations)

This distribution facility does not manufacture pharmaceutical products. Therefore, this source is not subject to the requirements of 326 IAC 8-5-3.

### State Rule Applicability – Boilers #1 and #2

#### 326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = emission rate limit (lbs/MMBtu)  
Q = total source heat input capacity (MMBtu/hr)

The emission rate limit calculated from the equation above equals:

$$Pt = \frac{1.09}{(8.5 + 8.5)^{0.26}} = 0.52 \text{ lbs/MMBtu}$$

Therefore, the PM emission limit for each boiler is 0.52 lbs/MMBtu.

**326 IAC 7-1.1-2 (SO<sub>2</sub> Emission Limitations)**

The potential to emit SO<sub>2</sub> from each boiler is less than 25 tons per year. Therefore, the requirements of 326 IAC 7-1.1-2 (SO<sub>2</sub> Emission Limitations) are not applicable to these boilers.

**State Rule Applicability – Emergency Generator EG-1 and Diesel Fire Pump DFP**

**326 IAC 9-1-2 (Carbon Monoxide Emission Requirements)**

This source is not among the listed source categories in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1-2 are not applicable.

**326 IAC 10-1 (Nitrogen Oxide Emission Requirements)**

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

**326 IAC 7-1.1-2 (SO<sub>2</sub> Emission Limitations)**

The potential to Emit SO<sub>2</sub> from the emergency generator and the diesel fire pump is less than 25 tons per year. Therefore, the requirements of 326 IAC 7-1.1-2 (SO<sub>2</sub> Emission Limitations) are not applicable to these units.

**State Rule Applicability - Diesel Storage Tanks**

**326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)**

This source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9 are not applicable to the storage tanks at this source.

**326 8-4-3 (Petroleum Liquid Storage Facilities)**

The fuel storage tanks at this source have capacities less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable to these tanks.

**326 IAC 12 (NSPS Requirements)**

The storage tanks at this source have capacities less than 40 cubic meters (10,567 gallons). Therefore, these solvent storage tanks are not subject to the requirements of New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb as of date July1, 2000).

**Conclusion**

The construction and operation of this pharmaceutical distribution facility shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 063-19057-00053.

**Appendix A: Emission Calculations  
From Boilers #1 and #2**

**Company Name: Eli Lilly and Company Distribution Facility  
Address: Airwest Business Park, Stanley Rd., Plainfield, IN 46168  
MSOP: 063-19057-00053  
Reviewer: ERG/YC  
Date: May 11, 2004**

**1. PTE of the Boilers While Burning Natural Gas:**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
17.0 (2 units combined)	148.9

Emission Factor in lbs/MMCF	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.57</b>	<b>0.57</b>	<b>0.04</b>	<b>7.45</b>	<b>0.41</b>	<b>6.25</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100 lbs/MMCF.

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

**Methodology**

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

PTE (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

**2. PTE of the Boilers While Burning Back-up No. 2 Fuel Oil:**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
17.0 (2 units combined)	1063.7	0.5

Emission Factor in lbs/kgal	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	2.0	2.0	71 (142.0 S)	20.0	0.34	5.0
<b>Potential to Emit in tons/yr</b>	<b>1.06</b>	<b>1.06</b>	<b>37.8</b>	<b>10.6</b>	<b>0.18</b>	<b>2.66</b>

\*PM emission factor is for filterable PM emissions only. Assume PM10 emissions equal PM emissions.

Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (AP-42, 09/98).

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu.

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.140 MMBtu

PTE (tons/yr) = Potential Throughput (kgals/yr) x Emission Factor (lbs/kgal) x 1 ton/2000 lbs

**3. PTE of the Boilers (Worst Case):**

Pollutant	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
<b>*PTE (tons/yr)</b>	<b>1.06</b>	<b>1.06</b>	<b>37.8</b>	<b>10.6</b>	<b>0.41</b>	<b>6.25</b>

\*PTE of these units are the worst case scenario between burning natural gas or No. 2 fuel oil.

**Appendix A: Emission Calculations  
Internal Combustion Engines**

**From the Emergency Generator EG-1**

**Company Name: Eli Lilly and Company Distribution Facility**  
**Address: Airwest Business Park, Stanley Rd., Plainfield, IN 46168**  
**MSOP: 063-19057-00053**  
**Reviewer: ERG/YC**  
**Date: May 11, 2004**

Power Output  
Horse Power (HP)

Operation Limit  
hr/yr

S = Weight % Sulfur

2,922

500

0.5

Emission Factor in lbs/HP-hr	Pollutant					
	PM*	PM10*	SO <sub>2</sub> 4.05E-03 (8.09E-03*S)	NO <sub>x</sub> 2.40E-02	**VOC 7.05E-04	CO 5.50E-03
<b>Potential to Emit in tons/yr</b>	<b>0.51</b>	<b>0.51</b>	<b>2.95</b>	<b>17.5</b>	<b>0.52</b>	<b>4.02</b>

\*Assume PM10 emissions are equal to PM emissions.

\*\* Assume TOC (total organic compounds) emissions are equal to VOC emissions.

Emission factors are from AP-42, Table 3.4-1, SCC #2-02-004-01 (AP-42, 10/96).

Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

**Methodology**

$$\text{PTE (tons/yr)} = \text{Power Output (HP)} \times \text{Emission Factor (lbs/HP-hr)} \times \text{Operation Limit (hr/yr)} \times 1 \text{ ton}/2000 \text{ lbs}$$

**Appendix A: Emission Calculations  
Internal Combustion Engines**

**From the Diesel Fire Pump DFP-1**

**Company Name: Eli Lilly and Company Distribution Facility  
Address: Airwest Business Park, Stanley Rd., Plainfield, IN 46168  
MSOP: 063-19057-00053  
Reviewer: ERG/YC  
Date: May 11, 2004**

Power Output  
Horse Power (HP)

Operation Limit  
hr/yr

240

500

Emission Factor in lbs/HP-hr	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	**VOC	CO
	2.20E-03	2.20E-03	2.05E-03	3.10E-02	2.47E-03	6.68E-03
<b>Potential to Emit in tons/yr</b>	<b>0.13</b>	<b>0.13</b>	<b>0.12</b>	<b>1.86</b>	<b>0.15</b>	<b>0.40</b>

\*Assume PM10 emissions are equal to PM emissions.

\*\* Assume TOC (total organic compounds) emissions are equal to VOC emissions.

Emission factors are from AP-42, Chapter 3.3, Table 3.3-1, SCC #2-02-001-02 and 2-03-001-01 (AP-42 Supplement B, 10/96).

Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

**Methodology**

PTE (tons/yr) = Power Output (HP) x Emission Factor (lbs/HP-hr) x Operation Limit (hr/yr) x 1 ton/2000 lbs