



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 27, 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: Baxter Pharmaceutical Solutions, LLC / 105-19185-00040

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

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 9/16/03



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August 27, 2004

Mr. L. Lee Karras
Baxter Pharmaceutical Solutions, LLC
P.O. Box 3068
Bloomington, Indiana 47402

Re: 105-19185
First Minor Revision to
MSOP 105-16441-00040

Dear Mr. Karras:

Baxter Pharmaceutical Solutions, LLC was issued a permit on March 5, 2004 for a third party pharmaceutical manufacturing operation. A letter requesting changes to this permit was received on May 26, 2004. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding three (3) natural gas-fired boilers (BR11, BR12, BR13); removal of boilers D-1, D-2, and BLDG E boiler; and correction to equipment designators for existing units.

The following construction conditions are applicable to the proposed project:

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



Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. 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.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SD

cc: File - Monroe County
U.S. EPA, Region V
Monroe County Health Department
Air Compliance Section Inspector - Vaughn Ison
Compliance Data Section
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner



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NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Baxter Pharmaceutical Solutions LLC
927 South Curry Pike
Bloomington, Indiana 47403**

(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, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 105-16441-00040	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 5, 2004 Expiration Date: March 5, 2009

First Minor Permit Revision No.: 105-19185-00040	Pages Affected: 4, 5, 14 and 15
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 27, 2004

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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 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary third party pharmaceutical manufacturing operation.

Authorized Individual:	Lee Karras
Source Address:	927 South Curry Pike, Bloomington, Indiana 47403
Mailing Address:	P.O. Box 3068, Bloomington, Indiana 47402
General Source	Phone: 812-333-0887
SIC Code:	2834
County Location:	Monroe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

The owner or operator of this stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) pharmaceutical manufacturing operation consisting of:
- (1) One (1) mixing and formulation process, located in Buildings A, C, and D, mixing pharmaceuticals in batches at a worst case maximum rate of 440 pounds per hour;
 - (2) One (1) ancillary product filtration process, located in Buildings A, C, and D, removing suspended solids from the pharmaceuticals in preparation for packaging;
 - (3) One (1) vial or syringe preparation process, located in Buildings A, C, and D, decontaminating vials and syringes in preparation for filling with the pharmaceuticals produced;
 - (4) One (1) ancillary product filling process, located in Buildings A, C, and D, dispensing finished pharmaceuticals into vials or syringes in preparation for capping;
 - (5) One (1) ancillary capping process, located in Buildings A, C, and D, applying a cap in each vial or syringe in preparation for final packaging; and
 - (6) One (1) final packing process, packaging the capped vials and syringes in containers in preparation for shipping, located in Building B.
- (b) Two (2) 1.075 MMBtu/hr natural gas tangential fired boilers, identified as BR03 and BR04, located in Building A.

- (c) Two (2) 7.328 MMBtu/hr natural gas tangential fired boilers, identified as BR01 and BR02, located in Building A.
- (d) Two (2) 3.000 MMBtu/hr natural gas tangential fired boilers, identified as BR06 and BR07, located in Building C.
- (e) One (1) 14.7 MMBtu/hr natural gas tangential fired boiler, identified as BR05, located in Building C.
- (f) One (1) 0.45 MMBtu/hr natural gas tangential fired boiler, identified as BR09, located in Building F.
- (g) One (1) 5.59 MMBtu/hr No. 2 fuel oil fired internal combustion emergency generator, identified as GN02, providing service to Buildings A and C.
- (h) One (1) 0.56 MMBtu/hr natural gas fired emergency generator, identified as GN01, providing service to Building B.
- (i) One (1) 6.43 MMBtu/hr No. 2 fuel oil fired emergency generator, identified as GN05, providing service to Building D.
- (j) Three (3) natural gas-fired boilers (identified as BR11, BR12, and BR13), each with a maximum heat input capacity of 14.7 MMBtu per hour. These units were installed in 2004.

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

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is not a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3); and
- (c) It is not a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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]

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

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]

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)]

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]

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]

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]

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 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)]

- (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]

- (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 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 nonroad 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]
[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)]

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]

- (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, I/M & Billing 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 nonoverlapping 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]
The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements

- C.6 Performance Testing [326 IAC 3-6]
- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if

specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in 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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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.8 Compliance Monitoring [326 IAC 2-1.1-11]

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.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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.10 Malfunctions Report [326 IAC 16-2]

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.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

- (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 or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(do) 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

The pharmaceutical manufacturing operation consisting of:

- (1) One (1) mixing and formulation process, located in Buildings A, C, and D, mixing pharmaceuticals in batches at a worst case maximum rate of 440 pounds per hour;
- (2) One (1) ancillary product filtration process, located in Buildings A, C, and D, removing suspended solids from the pharmaceuticals in preparation for packaging;
- (3) One (1) vial or syringe preparation process, located in Buildings A, C, and D, decontaminating vials and syringes in preparation for filling with the pharmaceuticals produced;
- (4) One (1) ancillary product filling process, located in Buildings A, C, and D, dispensing finished pharmaceuticals into vials or syringes in preparation for capping;
- (5) One (1) ancillary capping process, located in Buildings A, C, and D, applying a cap in each vial or syringe in preparation for final packaging; and
- (6) One (1) final packing process, packaging the capped vials and syringes in containers in preparation for shipping, located in Building B.

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

Emission Limitations and Standards

D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this equipment and any control devices.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Two (2) 1.075 MMBtu/hr natural gas tangential fired boilers, identified as BR03 and BR04 located in Building A.
- (c) Two (2) 7.328 MMBtu/hr natural gas tangential fired boilers, identified as BR01 and BR02, located in Building A.
- (d) Two (2) 3.000 MMBtu/hr natural gas tangential fired boilers, identified as BR06 and BR07, located in Building C.
- (e) One (1) 14.7 MMBtu/hr natural gas tangential fired boiler, identified as BR05, located in Building C.
- (f) One (1) 0.45 MMBtu/hr natural gas tangential fired boiler, identified as BR09, located in Building F.
- (g) One (1) 5.59 MMBtu/hr No. 2 fuel oil fired internal combustion emergency generator, identified as GN02, providing service to Buildings A and C.
- (h) One (1) 0.56 MMBtu/hr natural gas fired emergency generator, identified as GN01, providing service to Building B.
- (i) One (1) 6.43 MMBtu/hr No. 2 fuel oil fired emergency generator, identified as GN05, providing service to Building D.
- (j) Three (3) natural gas-fired boilers (identified as BR11, BR12, and BR13), each with a maximum heat input capacity of 14.7 MMBtu per hour. These units were installed in 2004.

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

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the natural gas-fired boilers, all constructed after September 21, 1983, shall not exceed the pounds per million British thermal units heat input limit as shown in the table below:

Emission Unit ID (Boilers)	Total Source Max Heat Input Capacity (MMBtu/hr)	Particulate Emission Limit (lb/MMBtu)
BR01 through BR07, and BR09	38.0	0.42
BR11 through BR13	82.1	0.35

These limitations are based on the following equation:

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

Where Pt = Pounds of particulate matter emitted per million Btu (lb per MMBtu) heat input.
 Q = Total source maximum operating capacity rating in million Btu per hour heat input.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Notification Requirements for Boilers BR11, BR12, and BR13 [40 CFR 60.48c(a), 326 IAC 12]

The Permittee shall submit to the Office of Air Quality, a notification regarding Boilers BR11, BR12, BR13, and BR05. Said notification shall:

- (a) include:
 - (1) the date of construction or reconstruction, the date of anticipated startup, and the date of actual startup, as provided in 40 CFR 60.7; and
 - (2) the design heat input capacity of the boilers and identification of the fuels combusted in the boilers; and

- (b) 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

D.2.4 Record Keeping Requirements [40 CFR 60.48c(g) and (i), 326 IAC 12]

- (a) The Permittee shall maintain daily fuel records for the four (4) natural gas fired boilers (identified as BR05, BR11, BR12, and BR13).

Said records shall be maintained for a minimum period of two years following the date the information is recorded.

- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspection prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**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).

Company Name:	Baxter Pharmaceutical Solutions LLC
Address:	927 South Curry Pike
City:	Bloomington, Indiana 47403
Phone #:	812-333-0887
MSOP #:	105-16441-00040

I hereby certify that Baxter Pharmaceutical Solutions LLC is still in operation.
 no longer in operation.

I hereby certify that Baxter Pharmaceutical Solutions LLC is in compliance with the requirements of MSOP 105-16441-00040.
 not in compliance with the requirements of MSOP 105-16441-00040.

Authorized Individual (typed):
Title:
Signature:
Date:

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.

Noncompliance:

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 PERMIT 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: _____

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:

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

**Technical Support Document (TSD) for a Minor Permit Revision to a
Minor Source Operating Permit**

Source Background and Description

Source Name:	Baxter Pharmaceutical Solutions, LLC
Source Location:	927 South Curry Pike, Bloomington, Indiana, 47403
County:	Monroe
SIC Code:	2834
Operation Permit No.:	105-16441-00040
Operation Permit Issuance Date:	March 5, 2004
Permit Revision No.:	105-19185-00040
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a revision application from Baxter Pharmaceutical Solutions, LLC relating to the construction and operation of three (3) natural gas-fired boilers.

History

On May 26, 2004, Baxter Pharmaceutical Solutions, LLC. submitted a permit revision application to IDEM, OAQ requesting permission to construct and operate three (3) natural gas-fired boilers (identified as BR11, BR12, and BR13), each with a maximum heat input capacity of 14.7 MMBtu per hour. The Permittee also requested to change the designators for the existing natural gas-fired boilers and correction of the heat input capacity for one emergency generator (identified as GN05) from 5.97 to 6.43 MMBtu per hour.

The Permittee also requested the removal of three (3) natural gas-fired boilers (identified as D-1, D-2, and BLDG E Boiler) from the permit. Baxter Pharmaceutical Solutions, LLC was issued a New Construction Permit and MSOP No. 105-16441-00040 on March 5, 2004.

Existing Approvals

The source was issued a MSOP No. 105-16441-00040 on March 5, 2004. No other air approvals have been issued since the issuance of the MSOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision 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 26, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5).

Potential To Emit of the Revision

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.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.49
PM10	1.49
SO ₂	0.24
VOC	1.07
CO	16.3
NO _x	19.5

HAPs	Potential To Emit (tons/year)
Benzene	4.06E-04
Dichlorobenzene	2.32E-04
Formaldehyde	1.45E-02
Hexane	3.48E-01
Toluene	6.57E-04
TOTAL	3.64E-01

Justification for Revision

This revision is being performed through a MSOP Minor Permit Revision pursuant to 326 IAC 2-6.1-6(g)(4)(b)(ii) as the potential to emit of NO_x is greater than 10 tons per year and less than 25 tons per year.

Potential to Emit After Revision

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units after control. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Emission Unit	Potential to Emit (tons/year)						HAPs
	PM	PM10	SO ₂	VOC	CO	NO _x	
* Existing Boilers	1.29	1.29	0.10	0.92	14.0	16.6	0.38
* Existing Generators	0.02	0.02	0.12	0.004	0.05	0.21	
* Existing Pharmaceutical Manufacturing Operations	0.0	0.0	0.0	0.0	0.0	0.0	

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Three (3) New Boilers (BR11, BR12, and BR13)	1.49	1.49	0.24	1.07	16.3	19.5	0.36
Total PTE of the Entire Source after Revision	2.78	2.78	0.46	1.99	30.3	36.4	0.74
MSOP Threshold Levels	< 100	<100	<100	<100	<100	<100	Less than 10 for a single HAP and 25 for any combination of HAPs.

* The potential to emit of the existing units are from the Addendum to the Technical Support Document (TSD) for MSOP No. 105-16441-00040, issued March 5, 2004. Note that the PTE of the existing boilers and generators does not include the removed boilers (D-1, D-2 and BLDG E Boiler) and takes into account the corrected MMBtu per hour for generator GN05.

After adding the three (3) natural gas-fired boilers (BR11, BR12, and BR13), the potential to emit of the criteria pollutants from the entire source is still limited to less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 are not applicable to this source.

County Attainment Status

The source is located in Monroe County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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_x emissions are considered when evaluating the rule applicability relating to ozone. Monroe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Monroe County has been classified as attainment or unclassifiable 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 or 2-3 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 and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	2.78
PM10	2.78
SO ₂	0.46
VOC	1.99
CO	30.3
NO _x	36.4

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions are based on the potential to emit calculations for the source after this revision.

Part 70 Permit Deterioration

326 IAC 2-7 (Part 70 Permit Program)

This existing source including the emissions from this permit revision 105-19185-00040, is still 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/year.

This status is based on the potential to emit calculations for the source (see Appendix A).

Federal Rule Applicability

- (a) The three (3) boilers identified as BR11, BR12, and BR13 are subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because these boilers were constructed after June 9, 1989 and each have a heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, these boilers are subject to only the reporting requirements in 40 CFR 60.48c, because they burn natural gas only. As per the reporting requirements, the source must maintain daily records of the amount of natural gas combusted. If the source desires to change the timing of the recording of the fuel combusted from daily recording to monthly recording, then the source must send in this request to the following address:

George Czerniak
c/o United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17 J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

This request should reference the NSPS requirement.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Entire Source

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

This source was constructed in 2004 and is not in 1 of 28 source categories. At construction, the potential to emit of all criteria pollutants before control were less than 250 tons per year. After this revision, the potential to emit of each criteria pollutants shall remain less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 2-4.1 (Major Source of Hazardous Air Pollutants (HAP))

This source was constructed in 2004. The potential to emit HAPs from this source has never exceeded 10 tons per year for a single HAP and 25 tons per year for any combination of HAPs. In addition, the potential to emit HAPs from this revision is less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

State Rule Applicability - Natural Gas-fired Boilers

326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the natural gas-fired boilers, all constructed after September 21, 1983, shall not exceed the pounds per million British thermal units heat input limit as shown below:

Emission Unit ID (Boilers)	Total Source Max Heat Input Capacity (MMBtu/hr)	Particulate Emission Limit (lb/MMBtu)
BR01 through BR07, and BR09	38.0	0.42
BR11 through BR13	82.1	0.35

These limitations are based on the following equation:

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

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

Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Proposed Changes

The Table of Contents has been changed as necessary. Bold language has been added, language with a line through it has been deleted.

A.2 Emissions Units and Pollution Control Equipment Summary

The owner or operator of this stationary source is approved to construct and operate the following emissions units and pollution control devices:

. . . .

(b) Two (2) 1.075 MMBtu/hr natural gas tangential fired boilers, identified as **BR03LES-#1** and **BR04LES-#2**, located in Building A.

(c) Two (2) 7.328 MMBtu/hr natural gas tangential fired boilers, identified as **BR01HSS-01BR** and **BR02HSS-02BR**, located in Building A.

(d) Two (2) 3.000 MMBtu/hr natural gas tangential fired boilers, identified as **BR06Bryan-#1** and **BR07Bryan-#2**, located in Building C.

(e) One (1) 14.7 MMBtu/hr natural gas tangential fired boiler, identified as **BR05HSS-03BR**, located in Building C.

~~(f) One (1) 0.88 MMBtu/hr natural gas tangential fired boiler, identified as BLDG E Boiler, located in Building E.~~

(fg) One (1) 0.45 MMBtu/hr natural gas tangential fired boiler, identified as **BR09BLDG-F Boiler**, located in Building F.

~~(h) Two (2) 3.81 MMBtu/hr natural gas fired boilers, identified as D-1 and D-2, located in Building D.~~

(gi) One (1) 5.59 MMBtu/hr No. 2 fuel oil fired internal combustion emergency generator, identified as GN02, providing service to Buildings A and C.

(hj) One (1) 0.56 MMBtu/hr natural gas fired emergency generator, identified as GN01, providing service to Building B.

(ik) One (1) ~~6.435.97~~ MMBtu/hr No. 2 fuel oil fired emergency generator, identified as GN05, providing service to Building D.

(j) **Three (3) natural gas-fired boilers (identified as BR11, BR12, and BR13), each with a maximum heat input capacity of 14.7 MMBtu per hour. These units were installed in 2004.**

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Two (2) 1.075 MMBtu/hr natural gas tangential fired boilers, identified as **BR03LES #1** and **BR04LES#2**, located in Building A.
- (c) Two (2) 7.328 MMBtu/hr natural gas tangential fired boilers, identified as **BR01HSS-01BR** and **BR02HSS-02BR**, located in Building A.
- (d) Two (2) 3.000 MMBtu/hr natural gas tangential fired boilers, identified as **BR06Bryan #1** and **BR07Bryan #2**, located in Building C.
- (e) One (1) 14.7 MMBtu/hr natural gas tangential fired boiler, identified as **BR05HSS-03BR**, located in Building C.
- ~~(f) One (1) 0.88 MMBtu/hr natural gas tangential fired boiler, identified as BLDG E Boiler, located in Building E.~~
- (fg) One (1) 0.45 MMBtu/hr natural gas tangential fired boiler, identified as **BR09BLDG F Boiler**, located in Building F.
- ~~(h) Two (2) 3.81 MMBtu/hr natural gas fired boilers, identified as D-1 and D-2, located in Building D.~~
- (gi) One (1) 5.59 MMBtu/hr No. 2 fuel oil fired internal combustion emergency generator, identified as GN02, providing service to Buildings A and C.
- (hj) One (1) 0.56 MMBtu/hr natural gas fired emergency generator, identified as GN01, providing service to Building B.
- (ik) One (1) ~~6.435-97~~ MMBtu/hr No. 2 fuel oil fired emergency generator, identified as GN05, providing service to Building D.
- (j) **Three (3) natural gas-fired boilers (identified as BR11, BR12, and BR13), each with a maximum heat input capacity of 14.7 MMBtu per hour. These units were installed in 2004.**

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

D.2.1 Particulate Matter Emissions [326 IAC 6-2-4]

The owner or operator shall, for boilers LES #1, LES #2, HSS-01BR, HSS-02BR, Bryan #1, Bryan #2, HSS-03BR, BLDGE, and BLDGF, limit the PM emissions from each unit to 0.40 lb/MMBtu or less.

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the natural gas-fired boilers, all constructed after September 21, 1983 shall not exceed the pounds per million British thermal units heat input limit as shown in the table below:

Emission Unit ID (Boilers)	Total Source Max Heat Input Capacity (MMBtu/hr)	Particulate Emission Limit (lb/MMBtu)
BR01 through BR07, and BR09	38.0	0.42
BR11 through BR13	82.1	0.35

These limitations are based on the following equation:

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

Where P_t = Pounds of particulate matter emitted per million Btu (lb per MMBtu) heat input.
 Q = Total source maximum operating capacity rating in million Btu per hour heat input.

D.2.3 Notification Requirements; ~~for Boilers BR11, BR12, and BR13-HSS-03BR~~ [40 CFR 60.48c(a), 326 IAC 12]

The ~~Permittee~~owner or operator shall submit to the Office of Air Quality, a notification regarding Boilers **BR11, BR12, BR13-HSS-03BR and BR05**. Said notification shall:

-
- (2) the design heat input capacity of the boilers and identification of the fuels combusted in the boilers; and
-

D.2.4 Record Keeping Requirements; ~~Boiler HSS-03BR~~ [40 CFR 60.48c(g) and (i), 326 IAC 12]

(a) The ~~Permittee~~owner or operator shall, for ~~Boiler HSS-03BR~~, record and maintain **daily fuel records for the four (4) natural gas fired boilers (identified as BR05, BR11, BR12, and BR13)** of the amount of each fuel combusted during each day.

Said records shall be maintained for a minimum period of two years following the date the information is recorded.

- (b) **To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspection prescribed by the Preventive Maintenance Plan.**
- (c) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Conclusion

This permit revision shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 105-19185-00040.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
(Three (3) Boilers)**

Company Name: Baxter Pharmaceuticals Solutions , LLC
Address: 927 South Curry Pike, Bloomington, Indiana 47403
MSOP: 105-19185
Plt ID: 105-00040
Reviewer: ERG/SD
Date: July 1st, 2004

Heat Input Capacity
MMBtu/hour

Potential Throughput
MMCF/year

44.1 (3 units only)

386.3

Pollutant

	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	1.47	1.47	0.12	19.3	1.06	16.2

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

**Emission factors for NO_x (Uncontrolled) = 100 lb/MMCF

Emission factors 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 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential throughput (MMCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

PTE (tons/year) = Potential throughput (MMCF/year) * Emission factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
(Three (3) Boilers)**

Company Name: Baxter Pharmaceuticals Solutions , LLC
Address: 927 South Curry Pike, Bloomington, Indiana 47403
MSOP: 105-19185
Plt ID: 105-00040
Reviewer: ERG/SD
Date: July 1st, 2004

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	4.06E-04	2.32E-04	1.45E-02	3.48E-01	6.57E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	9.66E-05	2.12E-04	2.70E-04	7.34E-05	4.06E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
One (1) Emergency Generator using No. 2 Fuel Oil**

Company Name: Baxter Pharmaceuticals Solutions , LLC
Address: 927 South Curry Pike, Bloomington, Indiana 47403
MSOP: 105-19185
Pit ID: 105-00040
Reviewer: ERG/SD
Date: July 1st, 2004

Heat Input Capacity
MMBtu/hour

6.43

Potential Throughput
kgals/year

22.2

S = Weight % Sulfur

0.078

	Pollutant				
	PM/PM10*	SO ₂	NO _x	VOC	CO
Emission Factor (lb/kgal)	2.0	11.1 (142.0 S)	20.0	0.34	5.0
Potential To Emit (tons/year)	0.02	0.12	0.22	0.004	0.06

*PM emission factor is filterable PM only. Condensible PM emission factor is 1.3 lb/kgal. Assume all PM emissions are equal to PM10.

Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98.

1 gallon of No. 2 Fuel Oil has a heating value of 144,905 Btu per gallon.

METHODOLOGY

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) * 500 hours/year * 1 kgal/1000 gal * 1 gal/0.144905 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/kgal) * 1 ton//2000 lbs

* 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.

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
One (1) Emergency Generator using No. 2 Fuel Oil**

Company Name: Baxter Pharmaceuticals Solutions , LLC
Address: 927 South Curry Pike, Bloomington, Indiana 47403
MSOP: 105-19185
Pit ID: 105-00040
Reviewer: ERG/SD
Date: July 1st, 2004

HAPs - Metals

Emission Factor (lb/MMBtu)	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential To Emit (tons/year)	1.13E-04	8.45E-05	8.45E-05	8.45E-05	2.53E-04

HAPs - Metals (continued)

Emission Factor (lb/MMBtu)	Mercury 3.0E-06	Mangamese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential To Emit (tons/year)	8.45E-05	1.69E-04	8.45E-05	4.22E-04

No data was available in AP-42 for organic HAPs.

METHODOLOGY

Potential To Emit (tons/year) = Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760 hours/year * 1 ton/2000lb

**Appendix A: Emission Calculations
Summary**

Company Name: Baxter Pharmaceuticals Solutions , LLC
Address: 927 South Curry Pike, Bloomington, Indiana 47403
MSOP: 105-19185
Plt ID: 105-00040
Reviewer: ERG/SD
Date: July 1st, 2004

Emission Units	PM	PM10	SO₂	NO_x	VOC	CO
3 Boilers	1.47	1.47	0.12	19.3	1.06	16.2
1 Generator	0.02	0.02	0.12	0.22	0.00	0.06
TOTAL	1.49	1.49	0.24	19.5	1.07	16.3