



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: March 4, 2008  
RE: Eli Lilly / 165-22481-00009  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

**Notice of Decision: Approval – Effective Immediately**

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

If you wish to challenge this decision, IC 4-21.5-3-7 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, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



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Mr. Anurag Gupta  
Eli Lilly and Company, Clinton Laboratories Facility  
10500 South State Road 63  
Clinton, Indiana 47842

March 4, 2008

Re: 165-22481-00009  
First Significant Permit Modification to  
Part 70 Permit No.: T165-6462-00009

Dear Mr. Gupta:

Eli Lilly and Company, Clinton Laboratories Facility was issued a Part 70 Permit on October 1, 2004 for a stationary pharmaceutical manufacturing plant located at 10500 South State Road 63, Clinton, Indiana 47842. An application to modify the source was received on December 28, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following:

- (a) Permanently shutting down the bulk pharmaceutical manufacturing (BPM) operations;
- (b) Permanently shutting down the existing one (1) Bartlett-Snow incinerator; and
- (c) Permission to conduct two (2) performance tests for two (2) liquid waste incinerators (identified as TO3 and TO4).

Additional changes have been made to the permit as a result of administrative changes and changes to Federal and State regulations.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc. (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 386-1024 to speak

directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-0178.

Sincerely,

Original Signed By:  
Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

ERG/YC

Attachments:

cc: File – Vermillion County  
U.S. EPA, Region V  
Vermillion County Health Department  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling



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# PART 70 OPERATING PERMIT AND PREVENTION OF SIGNIFICANT DETERIORATION (PSD) FLEXIBLE PERMIT OFFICE OF AIR QUALITY

**Eli Lilly and Company  
Clinton Laboratories Facility  
10500 South State Road 63  
Clinton, Indiana 47842**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T165-6462-00009	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 1, 2004  Expiration Date: October 1, 2009
1 <sup>st</sup> Significant Permit Modification No.: 165-22481-00009	Affected pages: Entire Permit
Issued by: Original Signed By:  Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: March 4, 2008  Expiration Date: October 1, 2009

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**Stratospheric Ozone Protection**

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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary pharmaceutical manufacturing plant.

Source Address: 10500 South State Road 63, Clinton, Indiana, 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana, 47842  
Source Phone Number: (765) 832-4400  
SIC Code: 2833, 2834, 2879  
County Location: Vermillion County  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program;  
Major Source under PSD;  
Major Source, Section 112 of the Clean Air Act;  
1 of 28 Source Categories

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

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

- (a) D.1 Utilities Operations: The utilities operations consist of one coal-fired boiler equipped with an ash handling system, four natural gas/fuel oil boilers, and other miscellaneous support equipment. The boilers provide steam to process operations in animal health manufacturing. The detailed equipment list is located in Section D.1 of this permit.
- (b) D.2 Animal Health Manufacturing (AHM) – Fermentation Operations: The fermentation processes include the dry material storage area (C44A), the liquid material storage area (C44), raw material prep area (C43/C43A), the fermentation production areas (C41/C41A) and product storage area (C41). The detailed equipment list is located in Section D.2 of this permit.
- (c) D.3 Animal Health Manufacturing (AHM) – Product Recovery Operations: The whole broth products from fermentation are continuously fed to the product recovery equipment as capacity allows. The product recovery operations consist of extraction, evaporation, centrifugation and drying processes (C45/C45A), solvent recovery (C45/C45A), raw and recovered material storage (C45), and product storage (C45/C45A). The detailed equipment list is located in Section D.3 of this permit.
- (d) D.4 Animal Health Manufacturing (AHM) – Product Finishing Operations: The recovered and dried product from product recovery is continuously fed to the product finishing area as capacity allows. The product finishing operations consist of pelletizing, granulation, milling, mixing, conveying, blending and bagging equipment (C47/C47B/C47E). The detailed equipment list is located in Section D.4 of this permit.
- (e) D.5 Bulk Pharmaceutical Manufacturing (BPM) – Process Operations: The emission units in the BPM production operations have been permanently shut down and are designated for demolition. The applicable requirements for emission units in the BPM production operations that were permitted earlier are provided in Section D.5 of this permit.

- (f) D.6 Bulk Pharmaceutical Manufacturing (BPM) – Solvent Recovery Operations: The BPM solvent recovery emission units have been permanently shut down and are designated for demolition. The applicable requirements for emission units in the solvent recovery operations that were permitted earlier are provided in Section D.6 of this permit.
- (g) D.7 Bulk Pharmaceutical Manufacturing (BPM) – Solvent Storage Tank Operations: The BPM solvent storage tanks have been permanently shut down and are designated for demolition. The applicable requirements for solvent storage tanks that were permitted earlier are provided in Section D.7 of this permit.
- (h) D.8 Waste Storage Tank Operations: The waste storage tanks are defined as any waste management unit designed to contain an accumulation of affected wastewater or offsite waste material containing VOCs and/or VOHAP. Pressure vessels greater than 204.9 kPa without emissions to the atmosphere or vessels attached to motor vehicles are not waste storage tanks. The detailed equipment list is located in Section D.8 of this permit.
- (i) D.9 Waste Containers: Waste containers are segregated into small and large containers. A small waste container, such as a drum, contains affected wastewater or offsite waste material containing VOC/VOHAP with a capacity greater than 26.4 gallons and equal to or less than 110.5 gallons. A large waste container, such as a melon or a tanker truck, contains affected wastewater or offsite waste material containing VOC/VOHAP with a capacity greater than 110.5 gallons. Identification of these types of containers have not been individually listed given they are portable and continually change.
- (j) D.10 BPM Individual Drain Systems (IDSs): The BPM IDSs have been permanently shut down and are designated for demolition. The applicable requirements for individual drain systems that were permitted earlier are provided in Section D.10 of this permit.
- (k) D.11 Control Systems – RTO Operations: The regenerative thermal oxidizer (RTO) system consists of a closed-vent system that transports fume streams exhausted from the waste storage operations to the RTOs. The RTOs, designed to thermally destruct the VOC and/or VOHAP laden fume streams from the waste storage operations, are also equipped with caustic scrubbing systems to control hydrogen halide and halogen emissions. The detailed equipment list is located in Section D.11 of this permit.
- (l) D.12 Control Systems – TO3/TO4 Liquid Waste Incinerators: The TO3/TO4 liquid waste incinerators provide treatment of Lilly hazardous and non-hazardous waste to support its operational requirements, including high Btu liquids (primary waste) and low Btu liquids (secondary waste). The TO3/TO4 incinerators consist of a primary combustion chamber followed by a wet quench system, a condenser/absorber, a Hydro-Sonic® scrubber, a polishing scrubber, and a stack with continuous emissions monitoring. The detailed equipment list is located in Section D.12 of this permit.
- (m) D.13 Bartlett-Snow Solid Waste Incinerator: The Bartlett-Snow solid waste incinerator was permanently shut down on August 30, 2005 and is designated for demolition. The applicable requirements for Bartlett-Snow solid waste incinerator that was permitted earlier are provided in Section D.13 of this permit.
- (n) D.14 Support Operations - General Wastewater Conditions: The emission units associated with the wastewater operations can generally be described as storage and transfer facilities (wastewater tanks and containers) and treatment facilities (incineration or off-site treatment). The specific emission units are described in Sections D.8, D.9, D.12 and D.15 of this permit. The general conditions for these types of operations are described in Section D.14 of this permit.
- (o) D.15 Support Operations – Transfer of Affected Wastewater for Offsite Treatment Conditions: The transfer of affected wastewater for offsite treatment relates to either the shipment of affected wastewater stored onsite to an offsite treatment facility, or receipt of

an offsite affected wastewater to be treated onsite. The specific conditions for these types of operations are described in Section D.15 of this permit.

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

- (a) This stationary source consists of the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):
- (1) D.2 Animal Health Manufacturing (AHM) - Fermentation Operations: Various mixers, bump tanks and fermenter tanks in the fermentation operations each emitting less than 5 pounds PM<sub>10</sub> per hour or 25 pounds PM<sub>10</sub> per day. [326 IAC 6-3]
  - (2) D.8 Waste Storage Tank Operations: Various waste tanks containing affected wastewater or offsite waste material, each emitting less than 3 pounds VOC per hour or 15 pounds VOC per day. [40 CFR 63.1256(b), 40 CFR 63.685, 40 CFR 60.110b, 326 IAC 2-2, and 326 IAC 8-5-3]
  - (3) D.9 Waste Containers: Small and large waste containers in the operating areas, containing affected wastewater or offsite waste material, each emitting less than 3 pounds VOC per hour or 15 pounds VOC per day. [40 CFR 63.1256(d), 40 CFR 63.688, 326 IAC 2-2]
  - (4) D.16 Insignificant Activities: Cold-cleaning organic solvent degreasing operations that do not exceed 145 gallons of solvent usage per 12 months, except if subject to 326 IAC 20-6.
- (b) This stationary source consists of the following types of insignificant activities, as defined in 326 IAC 2-7-1(21), that do not have applicable requirements:
- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
  - (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
  - (3) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
  - (4) Combustion source flame safety purging on startup;
  - (5) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
  - (6) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
  - (7) VOC/HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
  - (8) VOC/HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
  - (9) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;

- (10) Cleaners and solvents with a combined use less than or equal to 145 gallons per 12 months characterized having a vapor pressure equal to or less than 2 kPa, 15 mm Hg, or 0.3 psi measured at 38°C (100°F); or having a vapor pressure equal to or less than 0.7 kPa, 5 mm Hg, or 0.1 psi measured at 20°C (68°F);
- (11) Closed loop heating and cooling systems;
- (12) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility;
- (13) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (14) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (15) Noncontact cooling tower systems that are forced and induced draft cooling tower systems not regulated under a NESHAP;
- (16) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (17) Heat exchanger cleaning and repair;
- (18) Process vessel degassing and cleaning to prepare for internal repairs;
- (19) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal;
- (20) Paved and unpaved roads and parking lots with public access;
- (21) Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day;
- (22) Coal bunker and coal scale exhausts and associated dust collector vents;
- (23) Asbestos abatement projects regulated by 326 IAC 14-10;
- (24) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (25) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (26) Blowdown from sight glasses; boilers; compressors; pumps; and cooling towers;
- (27) On-site fire and emergency response training approved by the department;
- (28) Emergency generators including gasoline generators not exceeding 110 horsepower, diesel generators not exceeding 1,600 horsepower; and natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (29) Stationary fire pumps;
- (30) Purge double block and bleed valves;

- (31) Filter or coalescer media changeout;
- (32) Vents from ash transport systems not operated at positive pressure;
- (33) A laboratory as defined in 326 IAC 2-7-1(21)(D);
- (34) Farm operations; and
- (35) Other activities below insignificant threshold levels:
  - (A) Building C86 10,000-gallon storage tank or other portable container(s) for storing hexane used for fire training with emissions less than 5 pounds per day or 1 ton per year of a single HAP.

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A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

### B.1 Definitions [326 IAC 2-7-1]

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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 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

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This permit, T165-6462-00009, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.

### B.2.1 Term of Conditions [326 IAC 2-1.1-9.5]

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.3 Enforceability [326 IAC 2-7-7]

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR Part 2, Subpart B.

### B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This

certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year, and shall be submitted no later than July 1 of next year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6 (1) and (6)] [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 after issuance of this permit, including the following information on each facility:
- (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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 PMPs 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 PMPs 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements, which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determination regarding this source:
- (1) **40 CFR Part 60, Subpart D – Fossil-Fuel Fired Steam Generating Units:** This source is not subject to 40 CFR Part 60, Subpart D because none of the boilers at the plant site exceed 250 MMBtu/hr in heat input capacity. [40 CFR 60.40(a)(1)]
  - (2) **40 CFR Part 60, Subpart E – Incinerators:** This source is not subject to 40 CFR Part 60, Subpart E because none of the incinerators at plant site exceed a charging rate of 50 metric tons per day. [40 CFR 60.50(a)]
  - (3) **40 CFR Part 60, Subparts VV, III, NNN and RRR – Synthetic Organic Chemical Manufacturing:** This source is not subject to 40 CFR Part 60, Subparts VV, III, NNN, and RRR because the source is not engaged in the manufacture of synthetic organic chemicals as defined by those standards. The source does not produce, as an intermediate, final product, co-product, or by-product, a chemical listed in 40 CFR 60.489 [Subpart VV], 40 CFR 60.617 [Subpart III], 40 CFR 60.667 [Subpart NNN], or 40 CFR 60.707 [Subpart RRR].
  - (4) **Section 111(d) Emission Guidelines:** No emission guidelines in 40 CFR Part 60, 40 CFR Part 62, Subpart P, and 326 IAC 11 are applicable to this source because the source does not own or operate an affected facility subject to those requirements.
  - (5) **40 CFR Part 61, Subpart C – Beryllium:** This source is not subject to 40 CFR Part 61, Subpart C and 326 IAC 14-3 because the incinerators at the source do not incinerate beryllium containing waste. [40 CFR 61.30(a) and 40 CFR 61.31(g)]
  - (6) **40 CFR Part 61, Subpart E – Mercury:** This source is not subject to 40 CFR Part 61, Subpart E and 326 IAC 14-5, which applies to, among other things, incinerators burning wastewater treatment plant sludge because the source does not incinerate wastewater treatment plant sludge in its incinerators. [40 CFR 61.50]

- (7) **40 CFR Part 61, Subpart FF – Benzene Waste Operations:** This source is identified as the type of facility subject to 40 CFR Part 61, Subpart FF, which applies to benzene waste operations. However, the total annual benzene quantity from facility waste is less than 10 megagrams per year (11 ton/year) and therefore the source is exempt from the specific requirements of 40 CFR Part 61, Subpart FF. [40 CFR 61.342(a)].
- (8) **40 CFR Part 63, Subparts F and G – Synthetic Organic Chemical Manufacturing:** This source is not subject to 40 CFR Part 63, Subparts F and G (326 IAC 20-11) because the source does not manufacture compounds listed in Table 1 of Subpart F or use as a reactant compounds listed in Table 2 of Subpart F. [40 CFR 63.100(b)]
- (9) **40 CFR Part 63, Subpart O – Ethylene Oxide Sterilizers:** This source is not subject to 40 CFR Part 63, Subpart O and 326 IAC 20-5 because the source does not utilize ethylene oxide in sterilization operations. [40 CFR 63.360]
- (10) **40 CFR Part 63, Subpart Q – Industrial Process Cooling Towers:** This source is not subject to 40 CFR Part 63, Subpart Q and 326 IAC 20-4 because the source does not utilize chromium based water treatment compounds in its cooling towers. [40 CFR 63.400]
- (11) **40 CFR Part 63, Subpart T – Halogenated Solvent Cleaning:** This source is not subject to 40 CFR Part 63, Subpart T and 326 IAC 20-6 because the source does not use halogenated solvents in any solvent cleaning machines. [40 CFR 63.460]
- (12) **40 CFR Part 63, Subpart YY – Generic MACT Categories:** This source is not subject to 40 CFR Part 63, Subpart YY and 326 IAC 20-44 because the source is not one of the source categories described in 40 CFR 63.1103. [40 CFR 63.1100]
- (13) **40 CFR Part 63, Subpart MMM – Pesticide Active Ingredient Production:** This source is not subject to 40 CFR Part 63, Subpart MMM and 326 IAC 20-45 because the source does not contain any pesticide active ingredient process units or associated equipment as described in 40 CFR 63.1360. [40 CFR 63.1360]
- (14) **40 CFR Part 63, Subpart FFFF – Miscellaneous Organic Chemical Production and Processes:** This source is not subject to 40 CFR Part 63, Subpart FFFF because the source does not contain any miscellaneous organic chemical manufacturing process units (MCPU) that would be subject to Subpart FFFF.
- (15) **40 CFR Part 63, Subpart GGGGG – Site Remediation:** This source is not subject to 40 CFR Part 63, Subpart GGGGG because the site is not performing any remediation activities as defined in this rule.
- (16) **326 IAC 6-5 – Fugitive Particulate Matter Emission Limitations:** This source does not have potential fugitive dust emissions greater than 25 tons per year, and is therefore, not subject to the requirements of this rule.
- (17) **326 IAC 8-4 – Petroleum Sources:** This source does not operate any facilities subject to the requirements of 326 IAC 8-4. 326 IAC 8-4-6 is not applicable to this source because the source does not accept deliveries of gasoline by transports, as defined by 326 IAC 1-2-84.

- (18) **326 IAC 8-6 – Organic Solvent Emissions Limitations:** The provisions of 326 IAC 8-6 are not applicable to this source because the source is subject to other rules in 326 IAC 8.
  - (19) **326 IAC 10 – Nitrogen Oxide Rules:** This source does not contain any emission units identified in 326 IAC 10-4. Therefore, the source is not subject to the NO<sub>x</sub> emission control requirements of that rule.
  - (20) **326 IAC 15 – Lead Rules:** This source does not contain any emission units described in 326 IAC 15. Therefore, the source is not subject to the requirements of those rules.
  - (21) **326 IAC 21 – Acid Deposition:** This source does not contain any emission units described in 326 IAC 21. Therefore, the source is not subject to the requirements of those rules.
  - (22) **40 CFR Part 60, Subpart Ec – Hospital/Medical/Infectious Waste Incinerators:** This source does not contain any emission units described in 40 CFR Part 60, Subpart Ec. Therefore, the source is not subject to the requirements of those rules.
  - (23) **40 CFR Part 60, Subpart CCCC – Commercial-Industrial Solid Waste Incinerators:** This source does not contain any emission units described in 40 CFR Part 60, Subpart CCCC. Therefore, the source is not subject to the requirements of those rules.
  - (24) **40 CFR Part 63, Subpart I – Equipment Leaks:** This source does not have any pharmaceutical production processes that use carbon tetrachloride or methylene chloride, or any other processes described in 40 CFR Part 63, Subpart I. Therefore, the source is not subject to the requirements of those rules.
  - (25) **40 CFR Part 63, Subpart RR – Individual Drain Systems:** This source does not have any individual drain systems that are described in 40 CFR Part 63, Subpart RR. Therefore, the source is not subject to the requirements of those rules.
  - (26) **40 CFR Part 63, Subpart EEEE – Organic Liquids Distribution:** This source does not have any organic liquid distribution operations described in 40 CFR Part 63, Subpart EEEE. Therefore, the source is not subject to the requirements of those rules.
  - (27) **326 IAC 9 – Carbon Monoxide Rules:** Except for TO3/TO4 liquid waste incinerators, this source does not contain any emission units subject to the provisions of 326 IAC 9-1-2. TO3/TO4 liquid waste incinerators are not subject to the requirements of 326 IAC 9-1 because they are subject to the requirements of 40 CFR Part 63, Subpart EEE. Therefore, this source is not subject to the requirements of 326 IAC 9-1.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
  - (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to T165-6462-00009, issued October 1, 2004 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- by this permit.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B, Condition B.11 - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal** [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) 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.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
  - (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.17 Permit Amendment or Modification** [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (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.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 have been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**  
  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

**B.20 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]**

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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 Part 70 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 any records that must be kept under the conditions of this permit;
- (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 any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251
- The application, which shall be submitted by the Permittee, does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 [Ask for OAQ, Billing, Licensing, and Training Section (BLT)].

**B.24 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]**

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- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

**B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314]][326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

**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 manufacturing 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 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 Part 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR Part 61, Subpart M]**

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

The requirement in 326 IAC 14-10-1(a) that the owner or operator shall use an Indiana Accredited Asbestos Inspector and all the requirements in 326 IAC 18 related to licensing requirements for asbestos inspectors are not federally enforceable.

## Testing Requirements [326 IAC 2-7-6(1)]

### C.8 Performance Testing [326 IAC 3-6]

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- (a) 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 Part 51, 40 CFR Part 60, 40 CFR Part 61, 40 CFR Part 63, 40 CFR Part 75, or other procedures approved by IDEM, OAQ.

All test protocols, 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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee 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.9 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 [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

### C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [326 IAC 3-5]

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- (a) This section applies to the operation and maintenance of equipment and devices specified in Section D of this permit to determine or monitor compliance, except that it does not apply to continuous emissions monitoring systems or continuous opacity monitoring systems described in Section D. Conditions C.11 (Maintenance of Continuous Emission Monitoring Equipment) and C.12 (Maintenance of Continuous Opacity Monitoring Equipment) establish the general operation and maintenance requirements for continuous emission monitoring systems and continuous opacity monitoring systems, respectively.
- (b) Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification, which shall be submitted by the Permittee, does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.
- (d) The Permittee shall keep records of monitoring system operation that include the following:
  - (1) All maintenance logs, calibration checks, and other required quality assurance activities.
  - (2) All records of corrective and preventive action.
  - (3) A log of monitoring system downtime, including the following:
    - (A) Date of monitoring system downtime.
    - (B) Time of commencement and completion of each downtime.
    - (C) Reason for each downtime.
- (e) The Permittee shall submit a report of monitoring system downtime as specified in Section D. The report shall include the following:
  - (1) Date of monitoring system downtime.
  - (2) Time of commencement.
  - (3) Duration of each downtime.
  - (4) Reasons for each downtime.
  - (5) Nature of system repairs and adjustments.
- (f) Except where permit conditions streamline similar applicable requirements pursuant to 326 IAC 2-7-24, nothing in this permit nor in 326 IAC 3-5 supersedes the monitoring provisions in 40 CFR Part 60 or 40 CFR Part 63.

C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 2-1.1-11] [326 IAC 3-5]

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- (a) Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated

within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification, which shall be submitted by the Permittee, does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment in accordance with applicable federal regulations and 326 IAC 3-5.
- (c) This provision applies only to CEMS operated solely for monitoring compliance with BACT limitations. The CEMS shall be operated at all times as specified in Section D, except during CEMS malfunctions, reasonable periods of necessary CEMS calibration or CEMS maintenance activities. CEMS calibration and maintenance activities shall be properly documented and shall be conducted pursuant to the standard operating procedures under 326 IAC 3-5-4(a).
- (d) The Permittee shall keep records in accordance with 326 IAC 3-5-6(b) that includes the following:
  - (1) All documentation relating to:
    - (A) design, installation, and testing of all elements of the monitoring system; and
    - (B) required corrective action or compliance plan activities.
  - (2) All maintenance logs, calibration checks, and other required quality assurance activities.
  - (3) All records of corrective and preventive action.
  - (4) A log of plant operations, including the following:
    - (A) Date of facility downtime.
    - (B) Time of commencement and completion of each downtime.
    - (C) Reason for each downtime.
- (e) In accordance with 326 IAC 3-5-7(5), the Permittee shall submit reports of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately. The reports shall include the following:
  - (1) Date of downtime.
  - (2) Time of commencement.
  - (3) Duration of each downtime.

- (4) Reasons for each downtime.
- (5) Nature of system repairs and adjustments.
- (f) Except where permit conditions streamline similar applicable requirements pursuant to 326 IAC 2-7-24, nothing in this permit nor in 326 IAC 3-5 supersedes the monitoring provisions in 40 CFR Part 60 or 40 CFR Part 63.
- (g) The Permittee shall prepare and submit to IDEM, OAQ a written report of the results of the quarterly cylinder gas audits and annual relative accuracy test audits within thirty (30) days after the end of each calendar quarter. The report must contain the information required by 326 IAC 3-5-5(e)(2). 326 IAC 3-5-5(e)(2) is not federally enforceable.
- (h) If the Permittee is required by 326 IAC 3-5-4(a) and Section D to prepare and implement a written standard operating procedure (SOP) for CEMS, it must be submitted to IDEM, OAQ within ninety (90) days after monitor installation. If revisions are made to the SOP, updates shall be submitted to IDEM, OAQ biennially. 326 IAC 3-5-4(a) is not federally enforceable.

C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 3-5]

- (a) As specified in Section D.1 of this permit, the Permittee shall install, calibrate, maintain, and operate the necessary continuous opacity monitoring system (COMS) and related equipment. For the boiler, the COMS shall be in operation at all times that fuel is being combusted in the boiler, except during COMS malfunctions and reasonable periods of necessary COMS calibrations, audits, maintenance, or repair activities.
- (b) The continuous opacity monitoring system is subject to the applicable performance and operating specifications, monitor system certification requirements, and quality assurance and quality control (QA/QC) requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a continuous opacity monitoring system (COMS) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of two (2) hours or more; or is down for the required audits for a period of four (4) hours or more – compliance with the applicable opacity limits shall be demonstrated by the following:
  - (1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the COMS. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.
    - (A) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
    - (B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin 40 CFR Part 60, Appendix A, Method 9 opacity observations within four hours of the second abnormal notation.
    - (C) VE notations may be discontinued once the COMS is back online or formal Method 9 readings have been implemented. Method 9 readings may be discontinued once the COMS is back online.

- (2) If the COMS does not come back online within twenty-four (24) hours of beginning of shutdown or malfunction, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.
  - (A) Visible emission readings shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the shutdown or malfunction.
  - (B) Method 9 opacity readings shall be repeated for a minimum five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that the COMS is back in operation.
  - (C) Method 9 readings may be discontinued once the COMS is back online.
  - (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Deviation and COMS Excess Emissions Reports.
- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with the Compliance Response Plan required by Condition C.15. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a violation of this permit.

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted its most recent written emergency reduction plan (ERP) consistent with safe operating procedures on March 26, 1998.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

##### **C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR Part 68]**

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If a regulated substance, as defined in 40 CFR Part 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR Part 68.

##### **C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

- 
- (a) Whenever a Testing and Monitoring condition establishes the requirement to implement a Compliance Response Plan (CRP), the Permittee shall prepare a CRP in conformance with this condition. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan (PMP) and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR Part 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current CRP or OMM Plan (or Parametric Monitoring Plan and SSM Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its CRP or OMM Plan (or Parametric Monitoring Plan and SSM Plan) to include such response steps taken.

The OMM Plan (or PMP and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR Part 60/63 requirement.

- (b) Reasonable response steps shall be taken when indicated by the provisions of a monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current CRP or OMM Plan (or Parametric Monitoring Plan and SSM Plan); or
  - (2) If none of the reasonable response steps listed in the CRP or OMM Plan (or Parametric Monitoring Plan and SSM Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B, Condition B.14 - Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C, Condition C.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a).
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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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 within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in a significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring

Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and 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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

- (c) 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) 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 years" means the twelve (12) consecutive month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of Condition C.18(c) for any “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in Condition C.18(c)(1) exceed the baseline actual emissions, as documented and maintained under Condition C.18(c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Condition C.18(c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with Conditions C.18(c)(2) and (3).
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this condition shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with Condition C.18(c) available for review upon a request for inspection by the Indiana Department of Environmental Management. The general public may request this information from the Indiana Department of Environmental Management under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR Part 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the applicable standards for recycling and emissions reduction contained in 40 CFR Part 82.

**SECTION D.1 UTILITIES OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section.						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control Devices**	Capacity	Units
C31	Ash Tank	Ash Tank for C31 Coal Fired Boiler	PVC31ASH TK TRNSFR	Baghouse**	6,361	Cubic Feet
C31	BLR01	Coal Fired Boiler	PVC31ESP	Baghouse**	243	MMBTU/hr
C21	BLR01	Natural Gas/#2 Oil Fired Boiler	PVC21BLR1		79.5	MMBTU/hr
C21	BLR02	Natural Gas/#2 Oil Fired Boiler	PVC21BLR2		79.5	MMBTU/hr
C21	BLR03	Natural Gas/#2 Oil Fired Boiler	PVC21BLR3		79.5	MMBTU/hr
C21	BLR04	Natural Gas/#2 Oil Fired Boiler	PVC21BLR4		140.6	MMBTU/hr
* Emissions units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21). ** Control devices marked with a double asterisk are required to meet an applicable limitation.						
(b) The following emissions units are not subject to applicable requirements described in this D section, and are listed only for informational purposes.						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control Devices**	Capacity	Units
C31	TK600*	Powdered Activated Carbon Silo	FLT630		2,294	Cubic Feet
C24	DFP01*	Diesel Fire Pump	PVC24DFP1		2.15	MMBTU/hr
C24	DFP02*	Diesel Fire Pump	PVC24DFP2		2.15	MMBTU/hr
C44	GEN01*	Emergency Diesel Generator	PVC44GEN1		3.99	MMBTU/hr
C55	GEN01*	Emergency Diesel Generator	PVC55GEN1		1.3	MMBTU/hr
C79	GEN01*	Back-Up Fire Pump Generator	PVC79GEN1		4.86	MMBTU/hr
C23	TK01*	#2 Fuel Oil Storage Tank	PVC23TK1		238,000	Gallons
C24	TK01*	#2 Fuel Oil Storage Tank	PVC24TK1		275	Gallons
C79	TK01*	#2 Fuel Oil Storage Tank	PVC79TK1		500	Gallons
C24	TK02*	#2 Fuel Oil Storage Tank	PVC24TK2		275	Gallons
* Emissions units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21). ** Control devices marked with a double asterisk are required to meet an applicable limitation.						

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

**D.1.1 Particulate Matter [326 IAC 6-2] [326 IAC 6-3]**

- (a) Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the coal-fired boiler (C31 BLR01) shall not exceed 0.34 pound per million Btu heat input.
- (b) Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from each of the natural gas/fuel oil-fired boilers (C21 BLR01, BLR02, BLR03 and BLR04) shall not exceed 0.19 pound per million Btu heat input.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Matter Emission Limitations for Manufacturing Processes), particulate matter emissions from the C31 ash tank shall not exceed 2.86 pounds per hour based on a maximum throughput of 0.585 tons per hour.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-4-8]

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- (a) Pursuant to 326 IAC 7-4-8 (SO<sub>2</sub> Emission Limitations), the SO<sub>2</sub> emissions from the coal-fired boiler (C31 BLR01) shall not exceed 4.72 pounds per million Btu heat input.
- (b) Pursuant to 326 IAC 7-4-8 (SO<sub>2</sub> Emission Limitations), the SO<sub>2</sub> emissions from each of the natural gas/fuel oil-fired boilers (C21 BLR01, BLR02, BLR03 and BLR04) shall not exceed 0.36 pound per million Btu heat input.

#### D.1.3 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

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Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following conditions apply as an alternative to the opacity limitations in Section C, Condition C.2 - Opacity:

- (a) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C, Condition C.2 - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C, Condition C.2 - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan is required for the coal-fired boiler and associated control devices. The requirements for a Preventive Maintenance Plan are described in Section B, Condition B.10 – Preventive Maintenance Plan.

### Compliance Determination Requirements

#### D.1.4.1 Particulate Matter Control

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In order to comply with Condition D.1.1(a), the baghouse for particulate matter control shall be in operation and control emissions from the coal-fired boiler C31 at all times that this boiler is in operation and combusting coal as the fuel.

#### D.1.5 Testing Requirements [326 IAC 2-7-6(1) and (6)]

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- (a) The Permittee shall perform particulate matter performance tests for the coal-fired boiler (C31 BLR01) utilizing Methods 5 or 17 (40 CFR Part 60, Appendix A) for PM or other methods as approved by the Commissioner. The initial stack test(s) must be completed within 36 months after initial issuance of this permit and within 180 days after initial startup of the baghouse. These tests shall be repeated every third calendar year from the calendar year of the most recently completed stack test. The requirements for conducting performance tests are described in Section C, Condition C.8 – Performance Testing.
- (b) No emissions testing is required for the boilers to assess compliance with the sulfur dioxide emissions limits established in Condition D.1.2(b) at this time, but IDEM may require performance testing when necessary. The requirements for conducting performance tests are described in Section C, Condition C.8 – Performance Testing.

#### D.1.6 Coal Sampling and Analysis for SO<sub>2</sub> [326 IAC 3-7] [326 IAC 7-2]

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The Permittee shall collect coal sampling and analysis data on a calendar month basis in accordance with one of the following methods specified in 326 IAC 3-7 for the coal-fired boiler (C31 BLR01):

- (a) Coal sampling and analysis performed using one of the following procedures:
  - (1) Sampling and analyzing the coal according to the Permittee's Coal Sampling and Assay Plan, submitted pursuant to 326 IAC 3-7-5(a). The following minimum sampling and analysis requirements shall be met:
    - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
    - (B) Coal shall be sampled at least two (2) times per day and at least one (1) time per twelve (12) hour period unless no coal is bunkered during the preceding twelve (12) hour period. This permit condition satisfies the requirements of 326 IAC 3-7-2(b)(3)(B).
    - (C) Minimum sample size shall be five hundred (500) grams;
    - (D) Samples shall be composited and analyzed at the end of each calendar month;
    - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
  - (2) Sampling and analyzing the coal pursuant to 326 IAC 3-7-2(a).
- (b) Upon written notification to IDEM by the Permittee, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-1.1-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]

**D.1.7 Fuel Oil Sampling and Analysis for SO<sub>2</sub> [326 IAC 7-2] [326 IAC 3-7]**

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The Permittee shall utilize one of the following methods for the natural gas/fuel oil-fired boilers when burning fuel oil:

- (a) Provide vendor analysis of quantity, heat content and sulfur content of fuel delivered, if accompanied by a certification; or
- (b) Analyze the oil sample to determine the sulfur content of the oil via the procedures in 326 IAC 3-7-4.
  - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (c) Conduct a stack test for sulfur dioxide emissions from the boiler, using 40 CFR Part 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(d)].

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.8 Continuous Opacity Monitoring [326 IAC 3-5]**

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Pursuant to 326 IAC 3-5-1 (Continuous Monitoring of Emissions), a continuous monitoring system

shall be calibrated, maintained, and operated for measuring opacity from the coal-fired boiler (C31 BLR01).

- (a) The Permittee shall comply with the applicable performance and operating specifications of 326 IAC 3-5-2.
- (b) The Permittee shall comply with the applicable monitor system certification requirements of 326 IAC 3-5-3.
- (c) The Permittee shall comply with the applicable quality assurance and quality control (QA/QC) requirements of 326 IAC 3-5-5.

#### D.1.9 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with coal-fired boiler C31 at least once per day when the boiler is in operation and combusting coal as fuel. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Condition C.15 – Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Condition C.15 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The span of the pressure drop monitor shall be less than 50 inches of water and the pressure drop gauge shall be calibrated annually.

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

#### D.1.10 Coal Characteristics and Consumption Records

The Permittee shall record the information described in items (a) through (d) below on a calendar month basis for the coal-fired boiler (C31 BLR01).

- (a) The total amount (expressed in tons) of coal combusted;
- (b) The average sulfur content (expressed in percentage by weight) of the coal combusted;
- (c) The average heat content (expressed in Btu per pound) of the coal combusted; and
- (d) The average sulfur dioxide emission rate (expressed in pounds per million Btu) for the coal-fired boiler (C31 BLR01).

#### D.1.11 Fuel Oil Characteristics and Consumption Records

The Permittee shall record the information described in items (a) through (e) below. The records shall be compiled on a calendar month basis.

- (a) The total amount of fuel oil combusted (expressed in pounds) for each of the natural gas/fuel oil-fired boilers.
- (b) The average sulfur content (expressed in percentage by weight) of the fuel oil combusted;
- (c) The average heat content (expressed in Btu per pound) of the fuel oil combusted;
- (d) The average sulfur dioxide emission rate (expressed in pounds per million Btu) for the natural gas/fuel oil-fired boilers (C21 BLR01, BLR02, BLR03 and BLR04) during periods of fuel oil combustion; and

- (e) Vendor analysis of the quantity, heat content and sulfur content of the fuel delivered, including a supplier certification.

#### D.1.12 Continuous Opacity Monitoring

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The Permittee shall maintain records of the continuous opacity monitor readings of the coal-fired boiler (C31 BLR01).

#### D.1.13 Baghouse Record Keeping Requirements

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To document compliance with Condition D.1.9, the Permittee shall maintain daily records of the pressure drop reading for the baghouse associated with coal fired boiler C31. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).

#### D.1.14 Standard Operating Procedures

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- (a) Pursuant to 326 IAC 3-5-4, the Permittee shall maintain a complete, written continuous monitoring standard operating procedure (SOP) for the continuous opacity monitor (COM). If revisions are made to the SOP, updates shall be submitted to the department biennially. The COM SOP should contain, at a minimum, the items described in 326 IAC 3-5-4(a).
- (b) Pursuant to 326 IAC 3-7-5(a), the Permittee shall maintain a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. 326 IAC 3-7-4 is not applicable to this source because 326 IAC 3-7-5(a) references only coal-fired facilities. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.

#### D.1.15 Reporting Requirements

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- (a) A quarterly summary of the information shall be submitted using the reporting form located at the end of this permit, or its equivalent. At a minimum, the report shall contain the information specified in Condition D.1.11.
- (b) The Permittee shall prepare and submit a written report of the results of the continuous opacity monitor calibration error audit for each calendar quarter. The report must contain the information required by 326 IAC 3-5-5(e)(2).
- (c) The Permittee shall prepare and submit a written report of excess opacity of the continuous opacity monitor each calendar quarter. The report must contain the information required by 326 IAC 3-5-7(4).
- (d) The Permittee shall prepare and submit a written report of continuous opacity monitor downtime each calendar quarter. The report must contain the information required by 326 IAC 3-5-7(5).

### **Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-12 and 326 IAC 2-2]**

#### D.1.16 Modifications and Construction: Advance Approval of Permit Conditions

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The emission units described in this D section are not subject to the advance approval permit conditions.

**SECTION D.2 AHM – FERMENTATION OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units have applicable conditions in this D section.						
<b>Bldg.</b>	<b>Unit ID*</b>	<b>Unit Description</b>	<b>Stack/Vent ID</b>	<b>Control**</b>	<b>Capacity</b>	<b>Units</b>
C41	TKF01	Fermenter	PVC41F01	Cyclone F1VLS	50,000	Gallons
C41	TKF02	Fermenter	PVC41F02	Cyclone F2VLS	50,000	Gallons
C41	TKF03	Fermenter	PVC41F03	Cyclone F3VLS	50,000	Gallons
C41	TKF04	Fermenter	PVC41F04	Cyclone F4VLS	50,000	Gallons
C41	TKF05	Fermenter	PVC41F05	Cyclone F5VLS	50,000	Gallons
C41	TKF06	Fermenter	PVC41F06	Cyclone F6VLS	50,000	Gallons
C41	TKF07	Fermenter	PVC41F07	Cyclone F7VLS	50,000	Gallons
C41	TKF08	Fermenter	PVC41F08	Cyclone F8VLS	50,000	Gallons
C41	TKF09	Fermenter	PVC41F09	Cyclone F9VLS	50,000	Gallons
C41	TKF10	Fermenter	PVC41F10	Cyclone F10VLS	50,000	Gallons
C41	TKF11	Fermenter	PVC41F11	Cyclone F11VLS	50,000	Gallons
C41	TKF12	Fermenter	PVC41F12	Cyclone F12VLS	50,000	Gallons
C41	TKF13	Fermenter	PVC41F13	Cyclone F13VLS	50,000	Gallons
C41	TKF14	Fermenter	PVC41F14	Cyclone F14VLS	50,000	Gallons
C41	TKF15	Fermenter	PVC41F16	Cyclone F15VLS	50,000	Gallons
C41	TKF16	Fermenter	PVC41F16	Cyclone F16VLS	50,000	Gallons
C41A	TKF17	Fermenter	PVC41AF17	Cyclone F17VLS	50,000	Gallons
C41A	TKF18	Fermenter	PVC41AF18	Cyclone F18VLS	50,000	Gallons
C41A	TKF19	Fermenter	PVC41AF19	Cyclone F19VLS	50,000	Gallons
C41A	TKF20	Fermenter	PVC41AF20	Cyclone F20VLS	50,000	Gallons
C41A	TKF21	Fermenter	PVC41AF21	Cyclone F21VLS	50,000	Gallons
C41A	TKF22	Fermenter	PVC41AF22	Cyclone F22VLS	50,000	Gallons
C41A	TKF23	Fermenter	PVC41AF23	Cyclone F23VLS	50,000	Gallons
C41A	TKF24	Fermenter	PVC41AF24	Cyclone F24VLS	50,000	Gallons
C41A	TKF25	Fermenter	PVC41AF25	Cyclone F25VLS	50,000	Gallons
C41A	TKF26	Fermenter	PVC41AF26	Cyclone F26VLS	50,000	Gallons
C41A	TKF27	Fermenter	PVC41AF27	Cyclone F27VLS	50,000	Gallons
C41A	TKF28	Fermenter	PVC41AF28	Cyclone F28VLS	50,000	Gallons
C41A	TKF29	Fermenter	PVC41AF29	Cyclone F29VLS	50,000	Gallons
C41A	TKF30	Fermenter	PVC41AF30	Cyclone F30VLS	50,000	Gallons
C41A	TKF31	Fermenter	PVC41AF31	Cyclone F31VLS	50,000	Gallons
C41A	TKF32	Fermenter	PVC41AF32	Cyclone F32VLS	50,000	Gallons
C44A	TK047	Vibrating Bin	PVC44AC047	Baghouse VS047**	42,000	Kg
C44A	TK048	Vibrating Bin	PVC44AC048	Baghouse VS048**	43,680	Kg
C44A	TK049	Vibrating Bin	PVC44AC049	Baghouse VS049**	43,680	Kg
C44A	TK050	Vibrating Bin	PVC44AC050	Baghouse VS050**	42,000	Kg
C44A	TK051	Vibrating Bin	PVC44AC047	Baghouse VS047**	42,000	Kg
C44A	TK052	Vibrating Bin	PVC44AC052	Baghouse VS052**	37,408	Kg
C44A	TK053	Vibrating Bin	PVC44AC052	Baghouse VS052**	37,408	Kg

C44A	TK054	Vibrating Bin	PVC44AC050	Baghouse VS050**	42,000	Kg
C44A	TK055	Vibrating Bin	PVC44AC055	Baghouse VS055**	43,680	Kg
C44A	TK056	Vibrating Bin	PVC44AC055	Baghouse VS055**	43,680	Kg
C44A	TK057	Vibrating Bin	PVC44AC055	Baghouse VS055**	43,680	Kg
C44A	TK058	Vibrating Bin	PVC44AC055	Baghouse VS055**	43,680	Kg
C43A	TK301	Batch Fermenter Tank	PVC43AAC301	Filter FLT301**, Baghouse VS311	7,500	Gallons
C43A	TK302	Batch Fermenter Tank	PVC43AAC301	Filter FLT302**, Baghouse VS311	7,500	Gallons

\* Emissions units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).

\*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

(b) The following emissions units do not have applicable conditions in this D section.

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C41	TKB01*	Bump Tank	PVC41B01	Cyclone B1VLS	7,000	Gallons
C41	TKB02*	Bump Tank	PVC41B02	Cyclone B2VLS	7,000	Gallons
C41	TKB03*	Bump Tank	PVC41B03	Cyclone B3VLS	7,000	Gallons
C41	TKB04*	Bump Tank	PVC41B04	Cyclone B4VLS	7,000	Gallons
C41	TKB05*	Bump Tank	PVC41B05	Cyclone B5VLS	7,000	Gallons
C41	TKB06*	Bump Tank	PVC41B06	Cyclone B6VLS	7,000	Gallons
C41	TKB07*	Bump Tank	PVC41B07	Cyclone B7VLS	7,000	Gallons
C41	TKB08*	Bump Tank	PVC41B08	Cyclone B8VLS	7,000	Gallons
C41	TKB09*	Bump Tank	PVC41B09	Cyclone B9VLS	7,000	Gallons
C41	TKB10*	Bump Tank	PVC41B10	Cyclone B10VLS	7,000	Gallons
C41	TKB11*	Bump Tank	PVC41B11	Cyclone B11VLS	7,000	Gallons
C41	TKB12*	Bump Tank	PVC41B12	Cyclone B12VLS	7,000	Gallons
C41	TKB13*	Bump Tank	PVC41B13	Cyclone B13VLS	7,000	Gallons
C41	TKB14*	Bump Tank	PVC41B14	Cyclone B14VLS	7,000	Gallons
C41	TKB15*	Bump Tank	PVC41B15	Cyclone B15VLS	7,000	Gallons
C41	TKB16*	Bump Tank	PVC41B16	Cyclone B16VLS	7,000	Gallons
C41A	TKB22*	Bump Tank	PVC41AB22	Cyclone B17VLS	7,000	Gallons
C41A	TKB24*	Bump Tank	PVC41AB24	Cyclone B18VLS	7,000	Gallons
C41A	TKB26*	Bump Tank	PVC41AB26	Cyclone B19VLS	7,000	Gallons
C41A	TKB28*	Bump Tank	PVC41AB28	Cyclone B20VLS	7,000	Gallons
C43A	SM311*	Screw Mixer	PVC43AAC304	Baghouse VS311	N/A	N/A
C43A	TK305*	Mineral Pot	PVC43AAC305	Filter FLT305	80	Gallons
C41	TKH01*	Hold Tank	PVC41TKH01		20,000	Gallons
C41	TKH02*	Hold Tank	PVC41TKH02		20,000	Gallons
C41	TKH03*	Hold Tank	PVC41TKH03		50,000	Gallons
C41	TKH04*	Hold Tank	PVC41TKH04		50,000	Gallons
C41	TKH05*	Hold Tank	PVC41TKH05		50,000	Gallons
C41	TKA01*	Additive Tank	PVC41TKA01	Cyclone VLS01	8,000	Gallons
C41	TKA02*	Additive Tank	PVC41TKA02	Cyclone VLS02	8,000	Gallons
C41	TKA03*	Additive Tank	PVC41TKA03	Cyclone VLS03	8,000	Gallons
C41	TKA04*	Additive Tank	PVC41TKA04	Cyclone VLS04	8,000	Gallons
C41	TKA05*	Additive Tank	PVC41TKA05	Cyclone VLS05	8,000	Gallons
C41	TKA06*	Additive Tank	PVC41TKA06	Cyclone VLS06	8,000	Gallons
C41A	TKA08*	Additive Tank	PVC41ATKA08	Cyclone VLS08	8,000	Gallons
C41A	TKA09*	Additive Tank	PVC41ATKA09	Cyclone VLS09	8,000	Gallons
C25	TK1*	Land Application Tank	PVC25TK1		500,000	Gallons

C98	TK001*	Land Application Tank	PVC98TK001		10,000	Gallons
C98	TK002*	Land Application Tank	PVC98TK002		600	Gallons
C98	TK003*	Land Application Tank	PVC98TK003		15,000	Gallons
C25	TK2*	Land Application Tank	PVC25TK2		500,000	Gallons
C25	TK3*	Land Application Tank	PVC25TK3		1,000,000	Gallons
CO7	TK30*	Land Application Tank	PVC7TK30		15,000	Gallons
CO7	TK5*	Land Application Tank	PVC7TK5		230,000	Gallons
CO7	TK5A*	Land Application Tank	PVC7TK5A		230,000	Gallons
C41A	TK001*	Condensate Tank	PVC41TK001		N/AV	N/AV
C41	TK002*	Condensate Tank	PVC41TK002		N/AV	N/AV
C41	TK003*	Condensate Tank	PVC41TK003		N/AV	N/AV
C44	TKL21*	Liquid Bulk Tank	PVC44TKL21		20,000	Gallons
C44	TKL22*	Liquid Bulk Tank	PVC44TKL22		20,000	Gallons
C44	TKL31*	Liquid Bulk Tank	PVC44TKL31		30,000	Gallons
C44	TKL32*	Liquid Bulk Tank	PVC44TKL32		30,000	Gallons
C44	TKL33*	Liquid Bulk Tank	PVC44TKL33		30,000	Gallons
C44	TKL34*	Liquid Bulk Tank	PVC44TKL34		30,000	Gallons
C44	TKL35*	Liquid Bulk Tank	PVC44TKL35		30,000	Gallons
C44	TKL36*	Liquid Bulk Tank	PVC44TKL36		30,000	Gallons
C44	TKL37*	Liquid Bulk Tank	PVC44TKL37		30,000	Gallons
C44	TKL51*	Liquid Bulk Tank	PVC44TKL51		50,000	Gallons
C44	TKL52*	Liquid Bulk Tank	PVC44TKL52		50,000	Gallons
C44	TKL53*	Liquid Bulk Tank	PVC44TKL53		50,000	Gallons
C44	TKL54*	Liquid Bulk Tank	PVC44TKL54		50,000	Gallons
C44A	AC410*	Vacuum Cleaning System	PVC44AACHOUS EVAC	Cyclone VS410B, Baghouse VS410A	N/A	N/A
C43A	VS202B*	Dust Collection Baghouse	PVC43AAC304		N/A	N/A
C44	WH059*	Weigh Hopper	PVC44VS059	Baghouse VSWH059	8,000	Kg
C44	WH060*	Weigh Hopper	PVC44VS060	Baghouse VSWH060	8,000	Kg
C44	WH061*	Weigh Hopper	PVC44VS061	Baghouse VSWH061	8,000	Kg
C43A	WI001*	Weigh Indicator	ACC43AW001		N/AV	N/AV

\* Emissions units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).

\*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

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

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from each fermenter (TKF01 through TKF32) shall not exceed 18.2 pounds per hour based on a maximum throughput of 9.256 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK047 (baghouse VS047) shall not exceed 1.4 pounds per hour based on a maximum throughput of 0.207 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK048 (baghouse VS048) shall not exceed 1.2 pounds per hour based on a maximum throughput of 0.148 tons per hour.
- (d) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK049 (baghouse VS049) shall not exceed 1.2 pounds per hour based on a maximum throughput of 0.148 tons per hour.

- (e) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK050 (baghouse VS050) shall not exceed 1.8 pounds per hour based on a maximum throughput of 0.284 tons per hour.
- (f) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK051 (baghouse VS047) shall not exceed 1.4 pounds per hour based on a maximum throughput of 0.207 tons per hour.
- (g) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK052 (baghouse VS052) shall not exceed 0.9 pounds per hour based on a maximum throughput of 0.105 tons per hour.
- (h) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK053 (baghouse VS052) shall not exceed 0.9 pounds per hour based on a maximum throughput of 0.105 tons per hour.
- (i) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK054 (baghouse VS050) shall not exceed 1.8 pounds per hour based on a maximum throughput of 0.284 tons per hour.
- (j) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK055 (baghouse VS055) shall not exceed 1.2 pounds per hour based on a maximum throughput of 0.148 tons per hour.
- (k) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK056 (baghouse VS055) shall not exceed 1.2 pounds per hour based on a maximum throughput of 0.148 tons per hour.
- (l) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK057 (baghouse VS055) shall not exceed 1.2 pounds per hour based on a maximum throughput of 0.148 tons per hour.
- (m) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the vibrating bin TK058 (baghouse VS055) shall not exceed 1.2 pounds per hour based on a maximum throughput of 0.148 tons per hour.
- (n) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the batch fermenter tank TK301 (filter FLT301 and baghouse VS311) shall not exceed 2.1 pounds per hour based on a maximum throughput of 0.372 tons per hour.
- (o) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the batch fermenter tank TK302 (filter FLT302 and baghouse VS311) shall not exceed 2.1 pounds per hour based on a maximum throughput of 0.372 tons per hour.

D.2.2 NESHAP for Pharmaceuticals Production Non-Applicability Determination [40 CFR Part 63, Subpart GGG]

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As stated in the Permittee's Notification of Compliance Status Report (NOCSR), submitted on March 20, 2003, which was submitted to satisfy the requirements of 40 CFR 63.1260(f), the fermentation processes are not subject to any of the emission reduction requirements in 40 CFR 63.1253 through 63.1256. Any modification made to these processes that changes the information submitted in the Permittee's NOCSR must be reported to IDEM as required by Condition F.1.12. If a new process operating scenario will trigger applicable requirements not described in this permit or compliance with applicable requirements shall be demonstrated by methodologies not described in this permit, this permit must be revised pursuant to 326 IAC 2-7-12.

**D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan (PMP) is required for the required facilities and control devices (marked with a double asterisk in the above table), that are used for compliance with an applicable limitation or standard. The requirements for a Preventive Maintenance Plan are described in Section B, Condition B.10 – Preventive Maintenance Plan.

**Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.2.4 Testing Requirements [326 IAC 2-7-6(1) and (6)]**

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No emissions testing is required for the emission units described in this Section, at this time, but IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. The requirements for conducting performance tests that may be required by IDEM in the future, are described in Section C, Condition C.8 – Performance Testing.

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

**D.2.5 Record Keeping Requirements**

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The Permittee shall maintain records of the Notification of Compliance Status Report (NOCSR), submitted to IDEM on March 20, 2003.

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-12 and 326 IAC 2-2]**

**D.2.6 Modifications and Construction: Advance Approval of Permit Conditions**

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The emission units described in this D section are not subject to the advance approval permit conditions.

**SECTION D.3 AHM – PRODUCT RECOVERY OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section.						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C45A	BL410	RECYCLE BLENDER	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	CENT401B*	CENTRIFUGE	N/A		N/A	N/A
C45A	CENT401C*	CENTRIFUGE	N/A		N/A	N/A
C45A	COS401D	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS420A	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS420L	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS421A*	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS421L*	SCREW CONVEYOR	N/A		N/A	N/A
C45A	D420	DRYER	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	D421	DRYER	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	EV450*	EVAPORATOR	PVC45AAC460	Vent Condenser HE450E, Carbon Adsorber CA460**	180	Gallons
C45A	SM410A	SCREW CONVEYOR MIXER	N/A		N/A	N/A
C45	TK370A*	NEW AMYL TANK	PVC45TK370A		38,265	Gallons
C45	TK370B*	NEW AMYL TANK	PVC45TK370B		20,834	Gallons
C45A	TK401*	WASH ALCOHOL HOLDING TANK	PVC45AAC460	Carbon Adsorber CA460**	4,259	Gallons
C45A	TK401G*	STORAGE TANK	PVC45AAC460	Carbon Adsorber CA460**	1,342	Gallons
C45A	TK450A*	STORAGE TANK	PVC45AAC460	Carbon Adsorber CA460**	100	Gallons
C45	VS156	TRANSFER BAGHOUSE	PVC45AC156A		N/A	N/A
C45	VS173	TRANSFER BAGHOUSE	PVC45AC173		N/A	N/A
C45	VS174	TRANSFER BAGHOUSE	PVCAC174A/174B		N/A	N/A
C45A	VS400*	TRANSFER BAGHOUSE	PVC45AAC400A		N/A	N/A
C45A	VS420B*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	VS421B*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	VS480A*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	VS480B*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45	TK350C*	RECYCLED AMYL TANK	PVC45TK350C		20,834	Gallons
C45	TK350D*	RECYCLED AMYL TANK	PVC45TK350D		20,834	Gallons
C45	TK360C*	RECYCLED AMYL TANK	PVC45TK360C		20,834	Gallons
C45	TK361C*	RECYCLED AMYL TANK	PVC45TK361C		20,834	Gallons
* Emission units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21). ** Control devices marked with a double asterisk are required to meet an applicable limitation.						
(b) The following emissions units are not subject to applicable requirements, and are listed only for informational purposes.						

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C45	EV002	EVAPORATOR	PVC45EV002		9,000	Gallons
C45	TK407*	CONTENTS EVAPS CLEANING	PVC45AAC407		15,000	Gallons
C45	TK408*	CONTENTS EVAPS CLEANING	PVC45AAC408		15,000	Gallons
C45	C24*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT114*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT115*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT116*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT117*	CENTRIFUGE	N/A		N/A	N/A
C45	COL201*	DISTILLATION COLUMN	PVC45TK201		2,100	Gallons
C45	COL204*	DISTILLATION COLUMN	PVC45TK204		3,800	Gallons
C45	COL219*	DISTILLATION COLUMN	PVC45TK219		3,800	Gallons
C45	COS109A	SCREW CONVEYOR	PVC45AC140A	Carbon Adsorber CA140	N/A	N/A
C45	COS109B*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS109D*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS109G*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS153*	SCREW CONVEYOR	PVC45COS153	Vent Sock VS153B	N/A	N/A
C45	COS160A*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS160B*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS260*	SCREW CONVEYOR	N/A		N/A	N/A
C45	D160/VLS160	DRYER/VAPOR-LIQUID SEPARATOR	PVC45CA140A	Carbon Adsorber CA140	N/A	N/A
C45	D260/VLS260	DRYER/VAPOR-LIQUID SEPARATOR	PVC45CA140A	Carbon Adsorber CA140	N/A	N/A
C45	D16/VS16*	DRYER/TRANSFER BAGHOUSE	PVC45AC016A		N/A	N/A
C45	DP17*	DRUM PACKER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	EV101	EVAPORATOR	PVC45EV101		9,000	Gallons
C45	EV108*	EVAPORATOR	PVC45EV108		1,000	Gallons
C45	EV202*	EVAPORATOR	PVC45EV202		937	Gallons
C45	FIL109	FILTER BELT	PVC45AC140A	Carbon Adsorber CA140	N/A	N/A
C45	VF109*	VIBRATORY FEEDER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	H107*	HOPPER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	SCF160*	SCREW CONV. FEEDER	N/A		N/A	N/A
C45	SCF260*	SCREW CONV. FEEDER	N/A		N/A	N/A
C45	SCR17*	SCREENER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	SM109*	SCREW CONV. MIXER	PVC45AC140A	Carbon Adsorber CA140	N/A	N/A
C45	SM153	SCREW CONVEYOR MIXER	PVC45SM153	Vent Sock VS153	N/A	N/A
C45	TK2A*	AMYL & WATER TK	N/A		50	Gallons
C45	TK8A*	PRODUCTION TK EV 202	PVC45ATK008A		3,000	Gallons
C45	TK8B*	PRODUCTION TK EV 202	PVC45ATK008B		3,000	Gallons
C45	TK8C*	RINSE WATER TANK	PVC45ATK008C		3,000	Gallons
C45	TK8D*	RINSE WATER TANK	PVC45ATK008D		3,000	Gallons
C45	TK8E*	RINSE WATER TANK	PVC45ATK008E		3,000	Gallons
C45	TK8F*	CLEANING SOLUTION	PVC45ATK008F		100	Gallons
C45	TK14A*	PROCESS TANK	PVC45TK14A		1,000	Gallons
C45	TK14B*	EVAP. TANK FOR COL 202	PVC45TK14B		1,000	Gallons
C45	TK14C*	PROCESS TANK	N/A		1,000	Gallons

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C45	TK14D*	PROCESS TANK	PVC45TK14D		1,000	Gallons
C45	TK18A*	PRODUCTION TANK	PVC45TK18A		1,300	Gallons
C45	TK20*	PRODUCTION TANK	PVC45TK020		300	Gallons
C45	TK21*	SODIUM SLURRY TANK	PVC45AC140A	Carbon Adsorber CA140	1,100	Gallons
C45	TK22*	SODIUM SLURRY TANK	PVC45AC140A	Carbon Adsorber CA140	1,100	Gallons
C45	TK25*	CRYSTALS	PVC45AC140A	Carbon Adsorber CA140	500	Gallons
C45	TK107*	SOLVENT STORAGE TK	N/A		400	Gallons
C45	TK108B*	EVAP. TANK FOR EV 108	N/A		68	Gallons
C45	TK109A*	AMYL & WATER	N/A		300	Gallons
C45	TK109C*	PRODUCTION TANK	PVC45HE109C		432	Gallons
C45	TK114A*	CENTRIFUGE TANK	PVC45AC140A	Carbon Adsorber CA140	470	Gallons
C45	TK114B*	CENTRIFUGE TANK	PVC45AC140A	Carbon Adsorber CA140	470	Gallons
C45A	TK147/VS147*	STORAGE TANK	PVC45AAC147		50	tons
C45A	TK148/VS148*	STORAGE TANK	PVC45AAC148		50	tons
C45	TK149/VS150C*	STORAGE TANK	PVC45AAC149		16,638	kg
C45	TK151	STORAGE TANK	PVC45TK151	Vent Sock VS151A	N/A	N/A
C45	TK152*	MATERIAL HANDLING	PVC45TK152	Vent Sock VS152	N/AV	N/AV
C45	TK153*	MATERIAL HANDLING	PVC45TK153	Vent Sock VS153A	N/AV	N/AV
C45	TK201*	DECANTER FOR COL201	PVC45TK201		3,000	Gallons
C45	TK202C*	PROD. TK FOR EV202	N/A		450	Gallons
C45	TK204*	DECANTER FOR COL204	PVC45TK204		N/A	N/A
C45	TK219*	DECANTER FOR COL219	PVC45TK219		N/A	N/A
C45	TK350B*	STRIPPER FEED TANK	PVC45TK350B		20,834	Gallons
C45	TK360B*	STRIPPER FEED TANK	PVC45TK360B		20,834	Gallons
C45	TK361B*	STRIPPER FEED TANK	PVC45TK361B		20,834	Gallons
C45	TK350A*	DECANTER	PVC45TK350A		20,834	Gallons
C45	TK360A*	DECANTER	PVC45TK360A		38,265	Gallons
C45	TK361A*	DECANTER	PVC45TK361A		38,265	Gallons
C45	TK380*	CLEANING SOLUTION TANK	PVC45TK380		15,000	Gallons
C45	TK381*	CLEANING SOLUTION TANK	PVC45TK381		15,000	Gallons
C45A	TK435U*	GLYCOL RECYCLE TANK	N/A		750	Gallons
C45A	TK490A*	WASTE TANK	PVC45ATK490A		3,500	Gallons
C45A	TK490B*	WASTE TANK	PVC45ATK490B		450	Gallons
C45	VS17*	VACUUM CLEANING BAGHOUSE	PVC45AC17		N/A	N/A
C45	VS172*	TRANSFER BAGHOUSE	PVC45AC172		N/A	N/A
C45	VS107A*	TRANSFER BAGHOUSE	PVC45AC107		N/A	N/A

\* Emission units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).  
\*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

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

**D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the transfer baghouse VS156 shall not exceed 7.86 pounds per hour based on a maximum throughput of 2.64 tons per hour.

- (b) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the transfer baghouse VS173 shall not exceed 7.86 pounds per hour based on a maximum throughput of 2.64 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from the transfer baghouse VS174 shall not exceed 9.85 pounds per hour based on a maximum throughput of 3.70 tons per hour.

#### D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 [Best Available Control Technology (BACT)] and CP 165-1966, the VOC emissions from BL410, CENT401B, CENT401C, COS401D, COS420A, COS420L, COS421A, COS421L, D420, D421, EV450, SM410A, TK401, TK401G, TK450A, VS400, VS420B, VS421B, VS480A, and VS480B shall be controlled by a carbon adsorber (CA460) with emissions limited to 2.85 pounds per hour.

The Permittee shall demonstrate compliance with the VOC emissions limit either on an hourly rolling average basis or on the one-hour block average.

#### D.3.3 NSPS Subpart Kb [326 IAC 12]

Pursuant to 326 IAC 12, the storage tanks TK350C, TK350D, TK360C, TK361C, TK370A and TK370B are subject to the applicable requirements of the NSPS Subpart Kb, as published July 1, 2000. However, pursuant to 40 CFR 60.110b(b), these tanks are exempt from the General Provisions (40 CFR Part 60, Subpart A) and from the provisions of this subpart, with the exception of the requirements in 40 CFR 60.116b(a) and (b). The record keeping requirements of 40 CFR 60.116b(a) and (b) are specified in Condition D.3.8. This requirement is not federally enforceable, and it expires when the October 15, 2003 amendments to Subpart Kb are incorporated into 326 IAC 12.

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for the CA460 carbon adsorber, which is used for compliance with an applicable limitation or standard. The requirements for a Preventive Maintenance Plan are described in Section B, Condition B.10 – Preventive Maintenance Plan.

### **Leak Detection and Repair Requirements**

#### D.3.5 Leak Detection and Repair [CP 165-1966]

Leak detection and repair shall be done on all pumps, flanges, and valves in Building C45A as specified in the Permittee's proposal submitted to IDEM on June 22, 1992. All in service pumps and valves shall be monitored initially on a monthly basis. All flanges shall be monitored initially on a quarterly basis. All leaks shall be repaired the first time the equipment is off line long enough to complete the repair, and the permittee will attempt to make repairs no later than five days after the leak is detected.

### **Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.3.6 Testing Requirements [326 IAC 2-7-6(1) and (6)]

No emissions testing is required for the emission units described in this Section, at this time, but IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. The requirements for conducting performance tests that may be required by IDEM in the future, are described in Section C, Condition C.8 – Performance Testing.

#### D.3.7 Carbon Adsorber CA460 Monitoring

The Permittee shall determine outlet emissions from the carbon adsorber CA460 by mass balance calculations, or direct measurement (e.g., flame ionization detector).

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

### **D.3.8 Record Keeping Requirements**

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- (a) The Permittee shall maintain records of the determination required by Condition D.3.7.
- (b) A record of the storage tank capacity and dimensions for tanks TK350C, TK350D, TK360C, TK361C, TK370A and TK370B, shall be readily accessible and kept for the life of the vessel. This requirement is not federally enforceable, and it expires when the October 15, 2003 amendments to 40 CFR Part 60, Subpart Kb are incorporated into 326 IAC 12.

### **D.3.9 Notification Requirements [326 IAC 12]**

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- (a) The Permittee shall notify IDEM, OAQ within 30 days when the maximum true vapor pressure of the liquids in TK350C, TK350D, TK360C, TK361C, TK370A or TK370B exceeds 27.6 kPa.
- (b) The notification shall be submitted to the address listed in Section C, Condition C.19 - General Reporting Requirements, of this permit. The notification is not required to be certified by the responsible official.
- (c) This condition is not federally enforceable, and it expires when the October 15, 2003 amendments to 40 CFR Part 60, Subpart Kb are incorporated into 326 IAC 12.

## **Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-12 and 326 IAC 2-2]**

### **D.3.10 Modifications and Construction: Advance Approval of Permit Conditions**

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The emission units described in this D section are not subject to the advance approval permit conditions.

**SECTION D.4 AHM – PRODUCT FINISHING OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section.						
<b>Bldg.</b>	<b>Unit ID*</b>	<b>Unit Description</b>	<b>Stack/Vent ID</b>	<b>Control**</b>	<b>Capacity</b>	<b>Units</b>
C47	BAG185*	BAGGER	PVC58AC190	Baghouse VS183, Carbon Adsorber CA190**	N/A	N/A
C47E	BAG813*	BAGGER	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47E	BL808A*	BLENDER	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	1,000	Cubic Ft.
C47E	BL808B*	BLENDER	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	1,000	Cubic Ft.
C47E	BL809A*	BLENDER	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	1,000	Cubic Ft.
C47E	BL809B*	BLENDER	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	1,000	Cubic Ft.
C47E	BL811A*	BLENDER MIXER	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	1,000	Cubic Ft.
C47E	BL811B*	BLENDER MIXER	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	1,000	Cubic Ft.
C47E	BS812*	BAG SLITTER	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	BS812A*	MANUAL REFEED HOPPER	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/AV	N/AV
C47B	COD480*	DRAG CONVEYOR	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47B	COD481*	DRAG CONVEYOR	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47B	COD490*	DRAG CONVEYOR	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47B	COD491*	DRAG CONVEYOR	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47	COE185*	BUCKET ELEVATOR	PVC58AC190	Baghouse VS183, Carbon Adsorber CA190**	N/A	N/A
C47B	COE440*	BUCKET ELEVATOR	PVC59AC520	Baghouse VS470, Carbon Adsorber CA520**	13,200	lb/hr
C47B	COE440A*	BUCKET ELEVATOR	PVC59AC520	Baghouse VS460, Carbon Adsorber CA520**	N/A	N/A
C47B	COE450*	BUCKET ELEVATOR	PVC59AC520	Baghouse VS460, Carbon Adsorber CA520**	N/A	N/A
C47B	COE451*	BUCKET ELEVATOR	PVC59AC520	Baghouse VS460, Carbon Adsorber CA520**	N/A	N/A
C47E	COE805*	BUCKET ELEVATOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COE807*	BUCKET ELEVATOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47	COS185*	SCREW CONVEYOR	PVC58AC190	Baghouse VS183, Carbon Adsorber CA190**	N/A	N/A
C47E	COS458*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS805A*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS805B*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS805C*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS805D*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS806A*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS806B*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A

C47E	COS806C*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS806D*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS807*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS807A*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS808*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS809*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	COS810A*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	COS810B*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	COS810C*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	COS810D*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	COS810E*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	COS811A*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47E	COS811B*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47E	COS811C*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47E	COS812A*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	COS812B*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	COS813*	SCREW CONVEYOR	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47	CY006*	CYCLONE SEPARATOR	PVC58AC190	Baghouse VS18, Carbon Adsorber CA190**	N/A	N/A
C47	CY008*	CYCLONE SEPARATOR	PVC58AC190	Baghouse VS17, Carbon Adsorber CA190**	N/A	N/A
C47B	CY461*	CYCLONE SEPARATOR	PVC59AC520	Baghouse VS460, Carbon Adsorber CA520**	N/A	N/A
C47B	CY462*	CYCLONE SEPARATOR	PVC59AC520	Baghouse VS460, Carbon Adsorber CA520**	N/A	N/A
C47B	CY471*	CYCLONE SEPARATOR	PVC59AC520	Baghouse VS470, Carbon Adsorber CA520**	660	lb/hr
C47B	DS470*	TOTE BAG DRUM STATION	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47E	DS811*	TOTE BAG DRUM STATION	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47E	H101	HOPPER	PVC47EH101	Vent Sock H101SOCK	N/A	N/A
C47E	H102	HOPPER	PVC47EH102	Vent Sock H102SOCK	N/A	N/A
C47E	H103	HOPPER	PVC47EH103	Vent Sock H103SOCK	N/A	N/A
C47	H180	HOPPER	PVC47H180	Vent Sock H180SOCK	N/A	N/A
C47B	H410*	HOPPER	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	H431*	HOPPER	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47E	H807*	HOPPER	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	H807A*	HOPPER	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	H812*	HOPPER	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	60	Cubic Ft.
C47E	H813C*	HOPPER	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47	PC006*	PELLET COOLER	PVC58AC190	Baghouse VS7, Carbon Adsorber CA190**	N/A	N/A
C47B	PC430*	PELLET COOLER	PVC59AC520	Baghouse VS430A, Carbon Adsorber CA520**	N/A	N/A
C47	PEL006*	PELLET MILL	PVC58AC190	Baghouse VS7, Carbon	N/A	N/A

				Adsorber CA190**		
C47B	PEL430*	PELLET MILL	PVC59AC520	Baghouse VS430A, Carbon Adsorber CA520**	N/A	N/A
C47B	RM440*	ROLLER MILL	PVC59AC520	Baghouse VS470, Carbon Adsorber CA520**	N/A	N/A
C47B	RM440A*	ROLLER MILL	PVC59AC520	Baghouse VS470, Carbon Adsorber CA520**	N/A	N/A
C47B	RM480*	ROLLER MILL	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47B	RM481*	ROLLER MILL	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47B	SCR450*	SCREENER	PVC59AC520	Baghouse VS460, Carbon Adsorber CA520**	N/A	N/A
C47B	SCR451*	SCREENER	PVC59AC520	Baghouse VS460, Carbon Adsorber CA520**	N/A	N/A
C47E	SCR813*	SCREENER	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47B	SCR490*	SCREENER	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47B	SCR491*	SCREENER	PVC59AC520	Baghouse VS480, Carbon Adsorber CA520**	N/A	N/A
C47	SM182*	RIBBON MIXER	PVC58AC190	Baghouse VS183, Carbon Adsorber CA190**	1,000	Cubic Ft.
C47	SM280	SCREW MIXER	PVC47SM280	Vent Sock SM280SOCK	N/A	N/A
C47	TB185*	TOTE BAGGER	PVC58AC190	Baghouse VS183, Carbon Adsorber CA190**	N/A	N/A
C47E	TB813*	TOTE BAG FILLER	PVC59AC520	Baghouse VS815B, Carbon Adsorber CA520**	N/A	N/A
C47E	TK101A	STORAGE TANK	PVC47ETK101A	Vent Sock TK101ASOCK	1,900	Cubic Ft.
C47E	TK101B	STORAGE TANK	PVC47ETK101B	Vent Sock TK101BSOCK	1,900	Cubic Ft.
C47E	TK102A	STORAGE TANK	PVC47ETK102A	Vent Sock TK102ASOCK	N/A	N/A
C47E	TK102B	STORAGE TANK	PVC47ETK102B	Vent Sock TK102BSOCK	N/A	N/A
C47E	TK103	STORAGE TANK	PVC47EVS103A	Baghouse VS103**	1,900	Cubic Ft.
C47	TK11A*	STORAGE TANK	PVC47TK11A	Vent Sock TK11ASOCK**	2,000	Cubic Ft.
C47	TK11B*	STORAGE TANK	PVC47TK11B	Vent Sock TK11BSOCK**	2,000	Cubic Ft.
C47	TK132*	MINERAL OIL TANK	PVC47TK132		31,087	Gallons
C47	TK181	STORAGE TANK	PVC47TK181	Vent Sock TK181SOCK	1,897	Cubic Ft.
C47	TK201A	SILO	PVC47AC201	Vent Sock TK201ASOCK**	1,900	Cubic Ft.
C47	TK201B	SILO	PVC47AC201	Vent Sock TK201BSOCK**	1,900	Cubic Ft.
C47	TK270	SILO	PVC47TK270	Vent Sock TK270SOCK	N/AV	N/AV
C47B	TK420	STORAGE TANK	PVC47BVS420	Baghouse VS420**	1,900	Cubic Ft.
C47E	TK806A*	STORAGE TANK	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	2,000	Cubic Ft.
C47E	TK806B*	STORAGE TANK	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	2,000	Cubic Ft.
C47E	TK806C*	STORAGE TANK	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	2,000	Cubic Ft.
C47E	TK806D*	STORAGE TANK	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	2,000	Cubic Ft.
C47	VS001	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47	VS010	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47	VS017	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47	VS018	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47	VS180	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47	VS182	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47	VS183	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47	VS201*	TRANSFER BAGHOUSE	PVC47AC201		N/A	N/A
C47	VS210*	TRANSFER BAGHOUSE	PVC47AC210		N/A	N/A
C47	VS004	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A

C47	VS400	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	VS410	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	VS430	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	VS430A	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	VS431	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	VS460	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	VS470	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47B	VS480	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47	VS007	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
C47E	VS810A*	TRANSFER BAGHOUSE	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	VS810B*	TRANSFER BAGHOUSE	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	VS810C*	TRANSFER BAGHOUSE	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	VS812*	TRANSFER BAGHOUSE	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	N/A	N/A
C47E	VS815A	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47E	VS815B	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47E	VS815C	TRANSFER BAGHOUSE	PVC59AC520	Carbon Adsorber CA520**	N/A	N/A
C47E	WB805	WEIGH BELT	PVC59AC520	Baghouse VS815A, Carbon Adsorber CA520**	N/A	N/A
C47E	WH810A*	WEIGH HOPPER	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	500	Cubic Ft.
C47E	WH810B*	WEIGH HOPPER	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	250	Cubic Ft.
C47E	WH810C*	WEIGH HOPPER	PVC59AC520	Baghouse VS815C, Carbon Adsorber CA520**	500	Cubic Ft.

\* Emission units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).

\*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

(b) The following emissions units are not subject to applicable requirements, and are listed only for informational purposes.

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C47	COS001*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS101*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS101A*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS101B*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS102*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS102A*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS102B*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS103*	SCREW CONVEYOR	N/A		N/A	N/A
C47	COS250A*	SCREW CONVEYOR	PVC47AC005B	Baghouse VS005B	N/A	N/A
C47	D250*	FLUIDIZED BED DRY	PVC47AC005B	Baghouse VS005B	N/A	N/A
C47	H012*	HOPPER	N/A		N/A	N/A
C47	H002*	HOPPER	N/A		N/A	N/A
C47	H201*	HOPPER	N/A		N/A	N/A
C47	H208*	HOPPER	PVC47AC005B	Baghouse VS005B	N/A	N/A
C47	H270*	HOPPER	N/A		N/A	N/A
C47	H003*	HOPPER	N/A		N/A	N/A
C47	HM006*	HAMMER MILL	N/A		N/A	N/A
C47	HM008*	HAMMER MILL	N/A		N/A	N/A
C47	HM250*	HAMMER MILL	PVC47AC005B	Baghouse VS005B	N/A	N/A
C47	SCR006*	SCREENER	N/A		N/A	N/A

C47	SM210A*	RIBBON MIXER	PVC47AC005B	Baghouse VS005B	N/A	N/A
C47	SM210B*	RIBBON MIXER	PVC47AC005B	Baghouse VS005B	N/A	N/A
C47	SS250*	SCREENERS	PVC47AC005B	Baghouse VS005B	N/A	N/A
C47	SUMP003*	WASTE SUMP	N/A		4,283	Gallons
C47	TK001A*	STORAGE TANK	PVC47TK1A	Vent Sock TK1ASOCK	2,009	Cubic Ft.
C47	TK001B*	STORAGE TANK	PVC47TK1B	Vent Sock TK1BSOCK	1,850	Cubic Ft.
C47	TK002*	STORAGE TANK	N/A		80	Tons
C47	TK180*	STORAGE TANK	N/A		N/A	N/A
C47	TK310*	RUBBER LINED TANK	PVC47TK310		500	Gallons
C47E	TK320*	LIQUID WASTE TANK	PVC47TK320		2,400	Gallons
C47	TK320A*	TYLOSIN WASTEWATER TANK	PVC47TK320A		175	Gallons
C47	TK330*	JACKETED TANK	PVC47 TK330		22,000	Gallons
C47	TK340*	TYLOSIN HOT WATER TANK	PVC47TK340		200	Gallons
C47B	TK410A*	STORAGE TANK	N/A		36	Tons
C47B	TK410B*	STORAGE TANK	N/A		36	Tons
C47B	TK453*	WASTE SUMP, PROC. WATER	PVC47TK453		1,000	Gallons
C47	TK006*	TRANSFER TANK	N/A		N/A	N/A
C47E	TK803*	VEGETABLE OIL TANK	N/A		8,000	Gallons
C47E	TK803A*	VEGETABLE OIL TANK	PVC47ETK803A		125	Gallons
C47E	TK804A*	MINERAL OIL TANK	PVC47ETK804A		125	Gallons
C47	VS005B*	TRANSFER BAGHOUSE	PVC47AC005B		N/A	N/A
C47	VS011*	TRANSFER BAGHOUSE	PVC47AC11		N/A	N/A
C47E	VS101*	TRANSFER BAGHOUSE	PVC47EAC101A		N/A	N/A
C47E	VS102*	TRANSFER BAGHOUSE	PVC47EAC102A		N/A	N/A
C47	VS013*	VACUUM CLEANING BAGHOUSE	PVC47AC13		N/A	N/A
C47	VS170A*	VACUUM CLEANING BAGHOUSE	PVC47AC170A		N/A	N/A
C47	VS220*	TRANSFER BAGHOUSE	PVC47AC220		N/A	N/A
C47	VS270*	TRANSFER BAGHOUSE	PVC47AC270		N/A	N/A
C47	VS280*	TRANSFER BAGHOUSE	PVC47AC280		N/A	N/A
C47	VS285*	TRANSFER BAGHOUSE	PVC47AC285		N/A	N/A
C47B	VS510*	VACUUM CLEANING BAGHOUSE	PVC47BAC510		N/A	N/A
C47E	VS815D*	VACUUM CLEANING BAGHOUSE	PVC47EAC815D		N/A	N/A
C47C	VS617*	VACUUM CLEANING BAGHOUSE	PVC47CAC617		NA	NA

\* Emission units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).

\*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

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

#### D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, C47 finishing process equipment shall be limited as follows:

Condition Subpart	Unit ID	Stack/Vent ID	Maximum Process Weight Rate (tons/hr)	Emissions Limitation (lb/hr)
a.	H101	PVC47EH101	12.0	21.7
b.	H102	PVC47EH102	9.60	18.7
c.	H103	PVC47EH103	24.0	34.5
d.	SM280	PVC47SM280	0.66	3.11
e.	TK101A	PVC47ETK101A	6.00	13.6
f.	TK101B	PVC47ETK101B	6.00	13.6
g.	TK102A	PVC47ETK102A	4.80	11.7
h.	TK102B	PVC47ETK102B	4.80	11.7
i.	TK103	PVC47EVS103A	24.0	34.5
j.	TK11A	PVC47TK11A	0.06	0.59
k.	TK11B	PVC47TK11B	0.06	0.59
l.	TK181	PVC47TK181	0.79	3.49
m.	TK201A	PVC47AC201	0.47	2.45
n.	TK201B	PVC47AC201	0.47	2.45
o.	TK270	PVC47TK270	0.66	3.11
p.	TK420	PVC47BVS420	0.03	0.36
q.	VS201	PVC47AC201	0.47	2.45
r.	VS210	PVC47AC210	0.47	2.45
s.	H180	PVC47H180	1.57	5.55

**D.4.2 Best Available Control Technology (BACT) [326 IAC 2-2-3] [326 IAC 8-1-6] [SSM 165-12309]**

- (a) VOC emissions from the equipment routed to stack PVC59AC520, shall be controlled by carbon adsorber CA520.
- (b) The carbon adsorber CA520 shall be operating at all times that the associated equipment is being operated. However, if there is a malfunction of the carbon adsorber CA520, the Permittee may finish processing any material that has entered the pellet mill PEL430.
- (c) Carbon adsorber CA520 shall reduce VOC emissions by ninety-five percent (95%), as measured by a comparison of the inlet and outlet concentrations to the carbon adsorber, unless outlet concentrations from the carbon adsorber are equal to or less than 10 parts per million (ppm). These limitations shall be based on a 3-hour block average.
- (d) VOC emissions from the equipment routed to stack PVC58AC190, as described in the facility description above, shall be controlled by carbon adsorber CA190.
- (e) The carbon adsorber CA190 shall be operating at all times that the associated equipment is being operated. However, if there is a malfunction of the carbon adsorber CA190, the Permittee may finish processing any material that has entered the pellet mill PEL006.
- (f) Carbon adsorber CA190 shall reduce VOC emissions by ninety-five percent (95%), as measured by a comparison of the inlet and outlet concentrations to the carbon adsorber, unless outlet concentrations from the carbon adsorber are equal to or less than 10 parts per million (ppm). These limitations shall be based on a 3-hour block average.

**D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan is required for the carbon adsorbers CA190 and CA520. The requirements for a Preventive Maintenance Plan are described in Section B, Condition B.10 – Preventive Maintenance Plan.

**D.4.4 NSPS Subpart Kb [326 IAC 12]**

Pursuant to 326 IAC 12, TK132 is subject to the applicable requirements of the NSPS Subpart Kb, as published July 1, 2000. However, pursuant to 40 CFR 60.110b(b), this tank is exempt from the General Provisions (40 CFR Part 60, Subpart A) and from the provisions of this subpart, with exception of the record keeping requirements of 40 CFR 60.116b(a) and (b). The

record keeping requirements of 40 CFR 60.116b(a) and (b) are specified in Condition D.4.8. This requirement is not federally enforceable, and it expires when the October 15, 2003 amendments to Subpart Kb are incorporated into 326 IAC 12.

### **Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.4.5 Testing Requirements [326 IAC 2-7-6(1) and (6)]**

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No emissions testing is required for the emission units described in this Section, at this time, but IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. The requirements for conducting performance tests that may be required by IDEM in the future, are described in Section C, Condition C.8 – Performance Testing.

#### **D.4.6 Continuous Emissions Monitoring [326 IAC 2-1.1-11] [326 IAC 3-5]**

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The Permittee shall continuously monitor the inlet and outlet VOC concentrations for carbon adsorbers CA520 and CA190. Continuous monitoring operation is defined as the collection of at least one measurement for each successive 15-minute period.

#### **D.4.7 Visible Emissions Observations [326 IAC 2-1.1-11]**

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The Permittee shall visually observe the emissions from TK103 exhaust while it is operating at least once per day. TK103 is considered to be operating only when raw materials are being unloaded into the tank. If abnormal emissions are observed, the Permittee shall follow the Compliance Response Plan as required by Condition C.15.

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

#### **D.4.8 Record Keeping Requirements**

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- (a) The Permittee shall maintain records of the continuous monitoring required by Condition D.4.6. The records shall include the data required by 326 IAC 3-5-6.
- (b) The Permittee shall maintain records of the visible emissions observations required by Condition D.4.7.
- (c) Pursuant to 326 IAC 3-5-4, the Permittee shall maintain a complete, written continuous monitoring standard operating procedure (SOP) for the continuous emissions monitors. The CEMS SOP should contain, at a minimum, the items described in 326 IAC 3-5-4(a).
- (d) The Permittee shall maintain records of the capacity and dimensions of TK132. The records shall be readily accessible and shall be kept for the life of the vessel. This requirement is not federally enforceable, and it expires when the October 15, 2003 amendments to 40 CFR Part 60, Subpart Kb are incorporated into 326 IAC 12.

#### **D.4.9 Reporting Requirements**

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- (a) **Reserved.**
- (b) The Permittee shall prepare and submit a written report of excess emissions of the continuous emissions monitors each calendar quarter. The report must contain the information required by 326 IAC 3-5-7(4).

#### **D.4.10 Notification Requirements [326 IAC 12]**

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- (a) The Permittee shall notify IDEM, OAQ within 30 days when the maximum true vapor pressure of the liquid in TK132 exceeds 27.6 kPa.
- (b) The notification shall be submitted to the address listed in Section C, Condition C.19 - General Reporting Requirements, of this permit. The notification is not required to be certified by the responsible official.
- (c) This condition is not federally enforceable, and it expires when the October 15, 2003 amendments to 40 CFR Part 60, Subpart Kb are incorporated into 326 IAC 12.

## **Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-12 and 326 IAC 2-2]**

### **D.4.11 Modifications and Construction: Advance Approval of Permit Conditions**

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The emission units described in this D section are not subject to the advance approval permit conditions.

**SECTION D.5 BULK PHARMACEUTICAL MANUFACTURING (BPM) PRODUCTION OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the facility description boxes is descriptive information and does not constitute enforceable conditions:				
The Permittee permanently shut down the emission units listed in Section D.5				
Source ID	Equipment Description	Stack/Vent ID	Nominal Capacity	Control Device
<i>Building C3:</i>				
CENT50	Heinkel Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT51	Heinkel Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT52	Heinkel Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT53	Heinkel Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
TK10	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK11	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO*
TK16	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO*
TK20	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK203	Process Tank (H <sub>2</sub> O)	N/A	3,000 gal	N/A
TK22	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK3	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK4	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK50A	Process Tank	PVC70A/BSCBR1/2	50 gal	RTO
TK50B	Receiver	PVC70A/BSCBR1/2	50 gal	RTO
TK51A	Receiver	PVC70A/BSCBR1/2	50 gal	RTO
TK51B	Receiver	PVC70A/BSCBR1/2	50 gal	RTO
TK52A	Receiver	PVC70A/BSCBR1/2	50 gal	RTO
TK53A	Receiver	PVC70A/BSCBR1/2	50 gal	RTO
TK77	Charge Tank	PVC70A/BSCBR1/2	100 gal	RTO
TK78	Charge Tank	PVC70A/BSCBR1/2	100 gal	RTO
TK8	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK81	Process Tank	PVC70A/BSCBR1/2	500 gal	RTO
TK85	Process Tank	PVC70A/BSCBR1/2	500 gal	RTO
TK9	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK97	Process Tank	PVC70A/BSCBR1/2	750 gal	RTO
<i>Building C13:</i>				
CENT71	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT72A	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT72B	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT72C	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT73A	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT73B	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT73C	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT74	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT75A	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
CENT75B	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO

CENT75C	Centrifuge	PVC70A/BSCBR1/2	N/A	RTO
TK1	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK10	Process Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK11	Caustic Tank	PVC13TK11	1,000 gal	RTO*
TK2	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK21	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
TK22	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK23	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK24	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK25	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK26	Process Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK27	Process Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK28	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK28A	Process Tank	PVC70A/BSCBR1/2	500 gal	RTO
TK29	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK3	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK3A	Charge Tank	PVC70A/BSCBR1/2	200 gal	RTO
TK30	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK302	Charge Tank	PVC70A/BSCBR1/2	500 gal	RTO
TK31	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK314	Phosphoric Acid Storage Tank	N/A	300 gal	N/A
TK32	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK33	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK34	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK35	Process Tank	N/A	4,000 gal	N/A
TK37	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO*
TK38	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO*
TK4	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK410	Water Tank	N/A	4,000 gal	N/A
TK5	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
TK59	Condensate Tank (H <sub>2</sub> O)	NA	200 gal	NA
TK6A	Process Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK6B	Process Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK71B	Filtrate Tank	PVC70A/BSCBR1/2	100 gal	RTO
TK7A	Charge Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK7B	Charge Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK8	Slurry Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
TK9	Process Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
<i>Building C13A:</i>				
RVD1	Rotary Vacuum Dryer	PVC70A/BSCBR1/2	170 cu ft	RTO
RVD2	Rotary Vacuum Dryer	PVC70A/BSCBR1/2	170 cu ft	RTO
RVD3	Rotary Vacuum Dryer	PVC70A/BSCBR1/2	170 cu ft	RTO
RVD4	Rotary Vacuum Dryer	PVC70A/BSCBR1/2	170 cu ft	RTO
RVD5	Rotary Vacuum Dryer	PVC70A/BSCBR1/2	165 cu ft	RTO
RVD6	Rotary Vacuum Dryer	PVC70A/BSCBR1/2	170 cu ft	RTO
RVD8	Rotary Vacuum Dryer	PVC70A/BSCBR1/2	170 cu ft	RTO
TK1B	Distillate Tank	PVC70A/BSCBR1/2	100 gal	RTO
TK3B	Distillate Pot	PVC70A/BSCBR1/2	100 gal	RTO

TK4B	Distillate Pot	PVC70A/BSCBR1/2	150 gal	RTO
TK5B	Distillate Pot	PVC70A/BSCBR1/2	100 gal	RTO
TK6B	Distillate Pot	PVC70A/BSCBR1/2	100 gal	RTO
TK8B	Distillate Tank	PVC70A/BSCBR1/2	150 gal	RTO

\*This equipment is currently not connected to the RTO but is not in service. However, this equipment shall be tied into the RTO control system prior to emitting VOC/VOHAP greater than the control threshold.

## Emission Limitations and Standards

D.5.1 through D.5.5 **Reserved**

## Testing and Monitoring Requirements

D.5.6 **Reserved**

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

D.5.7 Record Keeping Requirements

(a) Record Keeping Requirements

- (1) RTO Control System Records - The record keeping requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.
- (2) **Reserved**
- (3) **Reserved**
- (4) LDAR Records - The record keeping requirements for the LDAR standards are described in Sections E.1 and E.2 of this permit.
- (5) SSM Records - The Permittee shall maintain the following records from October 1, 2004 to the date on which BPM production buildings were disconnected from the fume transport system going to the RTO:
  - (A) Records of the current and superseded versions of SSM Plan.
  - (B) Occurrence/duration records of each process malfunction.
  - (C) Information to demonstrate conformance with each SSM are consistent with the procedures in the SSM Plan.
  - (D) Records of actions taken during each SSM when different from SSM Plan.

**SECTION D.6 BPM SUPPORT OPERATIONS – SOLVENT RECOVERY OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
<p>The information describing the processes contained in the facility description boxes is descriptive information and does not constitute enforceable conditions:</p> <p>The Permittee permanently shut down the emission units that were listed in Section D.6.</p> <p>Ancillary activities, such as heat exchange systems, are not considered process vents and have not been included in the description tables.</p>				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
<i>Building 63/63A:</i>				
C63-COL-06	Column	PVC70A/BSCBR1/2	1,619 gal	RTO
C63-COL-100	Pilot Column	PVC70A/BSCBR1/2	200 gal	RTO*
C63-COL-101	Distillation Column	PVC70A/BSCBR1/2	6,358 gal	RTO
C63-COL-103	Column	PVC70A/BSCBR1/2	5,454 gal	RTO
C63-COL-105	Column	PVC70A/BSCBR1/2	4,000 gal	RTO
C63-COL-107	Column	PVC70A/BSCBR1/2	5,764 gal	RTO
C63-EV-03	Evaporator	PVC70A/BSCBR1/2	4,000 gal	RTO
C63-EV-04	Evaporator	PVC70A/BSCBR1/2	3,000 gal	RTO
C63-EV-05	Evaporator	PVC70A/BSCBR1/2	4,000 gal	RTO
C63-EV-11	Evaporator	PVC70A/BSCBR1/2	3,000 gal	RTO
C63-EV-15	Evaporator	PVC70A/BSCBR1/2	750 gal	RTO
C63-EXT-17	Extractor	PVC70A/BSCBR1/2	275 gal	RTO
C63-EXT-19	Extractor	PVC70A/BSCBR1/2	1,000 gal	RTO
C63-TK-01A	pH Tank	PVC70A/BSCBR1/2	500 gal	RTO
C63-TK-01B	pH Tank	PVC70A/BSCBR1/2	500 gal	RTO
C63-TK-03P	Decanter Tank	PVC70A/BSCBR1/2	500 gal	RTO
C63-TK-06D	Vacuum Pot	PVC70A/BSCBR1/2	60 gal	RTO
C63-TK-07A	Multipurpose	PVC70A/BSCBR1/2	1,500 gal	RTO
C63-TK-07B	Process Tank	PVC70A/BSCBR1/2	1,500 gal	RTO
C63-TK-08A	Process Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
C63-TK-100A	Feed Tank	PVC70A/BSCBR1/2	250 gal	RTO*
C63-TK-100B	Hold Tank	PVC70A/BSCBR1/2	50 gal	RTO*
C63-TK-100C	Hold Tank	PVC70A/BSCBR1/2	50 gal	RTO*
C63-TK-100D	Hold Tank	PVC70A/BSCBR1/2	50 gal	RTO*
C63-TK-100E	Overheads Tank	PVC70A/BSCBR1/2	150 gal	RTO*
C63-TK-100F	Sidedraw Tank	PVC70A/BSCBR1/2	150 gal	RTO*
C63-TK-100G	Bottoms Tank	PVC70A/BSCBR1/2	150 gal	RTO*
C63-TK-101A	Overheads Tank	PVC70A/BSCBR1/2	300 gal	RTO
C63-TK-101C	Sidedraw Tank	PVC70A/BSCBR1/2	100 gal	RTO
C63-TK-103P	Process Tank	PVC70A/BSCBR1/2	300 gal	RTO
C63-TK-103S	Process Tank	PVC70A/BSCBR1/2	50 gal	RTO
C63-TK-105P	Process Tank	PVC70A/BSCBR1/2	400 gal	RTO
C63-TK-107P	Process Tank	PVC70A/BSCBR1/2	400 gal	RTO
C63-TK-107Q	Process Tank	PVC70A/BSCBR1/2	76 gal	RTO
C63-TK-10A	Process Tank	PVC70A/BSCBR1/2	4,000 gal	RTO

C63-TK-15P	Process Tank	PVC70A/BSCBR1/2	400 gal	RTO
C63-TK-17P	Process Tank	PVC70A/BSCBR1/2	50 gal	RTO
C63-TK-17S	Process Tank	PVC70A/BSCBR1/2	400 gal	RTO
C63-TK-19P	Process Tank	PVC70A/BSCBR1/2	50 gal	RTO
C63-TK-9A	Make-up Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
C63-TK-9AA	Process Tank	PVC70A/BSCBR1/2	70 gal	RTO
* This equipment is currently not connected to the RTO but is not in service. However, this equipment shall be tied into the RTO control system prior to startup.				

## Emission Limitations and Standards

D.6.1 through D.6.5 **Reserved**

## Testing and Monitoring Requirements

D.6.6 **Reserved**

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

### D.6.7 Record Keeping Requirements

(a) Record Keeping Requirements

- (1) RTO Control System Records - The record keeping requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.
- (2) LDAR Records - The record keeping requirements for the LDAR standards are described in Sections E.1 and E.2 of this permit.
- (3) **Reserved**
- (4) **Reserved**
- (5) Heat Exchange System Records – The Permittee shall maintain the following records from October 1, 2004 to the date on which BPM solvent recovery buildings were disconnected from the fume transport system going to the RTO for heat exchange systems that use water to cool process equipment or materials used in pharmaceutical manufacturing operations:
  - (A) A copy of the Heat Exchanger Monitoring Plan.
  - (B) **Reserved**
  - (C) **Reserved**
  - (D) **Reserved**
  - (E) **Reserved**
  - (F) The Permittee shall track the heat exchange systems that use water to cool process equipment or materials used in pharmaceutical manufacturing operations in an operating scenario maintained in the On-Site Implementation Log (OSIL).

- (6) SSM Records - The Permittee shall maintain the following records from October 1, 2004 to the date on which BPM solvent recovery buildings were disconnected from the fume transport system going to the RTO:
- (A) Records of the current and superseded versions of SSM Plan.
  - (B) Occurrence/duration records of each process malfunction.
  - (C) Information to demonstrate conformance with each SSM are consistent with the procedures in the SSM Plan.
  - (D) Records of actions taken during each SSM when different from SSM Plan.

**SECTION D.7 BPM SUPPORT OPERATIONS – SOLVENT STORAGE TANK CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The following information is descriptive information and does not constitute enforceable conditions:				
The Permittee permanently shut down the emission units that were listed in Section D.7.				
The information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
<i>Miscellaneous Storage Areas:</i>				
C64-TK-3	Solvent Tank	PVC70A/BSCBR1/2	20,000 gal	RTO*
C64-TK-99	Solvent Tank	PVC70A/BSCBR1/2	10,000 gal	RTO*
C96-TK-1	Solvent Tank	PVC70A/BSCBR1/2	10,000 gal	RTO
<i>Building C13:</i>				
C13-TK-102	Heat Transfer Media Tank	PVC70A/BSCBR1/2	200 gal	RTO
C13-TK-103	Heat Transfer Media Tank	PVC70A/BSCBR1/2	200 gal	RTO
C13-TK-220	Heat Transfer Media Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
C13-TK-309C	Heat Transfer Media Tank	PVC70A/BSCBR1/2	50 gal	RTO
<i>Building C63:</i>				
C63-TK-202	Solvent Tank	PVC70A/BSCBR1/2	5,000 gal	RTO
C63-TK-203	Solvent Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
C63-TK-204	Solvent Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
C63-TK-205	Solvent Tank	PVC70A/BSCBR1/2	5,000 gal	RTO
C63-TK-206	Solvent Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
C63-TK-208	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
C63-TK-210	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
C63-TK-211	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
C63-TK-212	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
C63-TK-213	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
C63-TK-214	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
C63-TK-215	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
C63-TK-216	Solvent Tank	PVC70A/BSCBR1/2	8,000 gal	RTO
<i>Building C64B – Tank Module:</i>				
C64B-TK-161	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64B-TK-163	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64B-TK-165	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64B-TK-167	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO

C64B-TK-169	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64B-TK-171	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64B-TK-173	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64B-TK-175	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64B-TK-177	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
<i>Building C64D – Tank Module:</i>				
C64D-TK-136	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64D-TK-138	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64D-TK-140	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64D-TK-142	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64D-TK-144	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64D-TK-146	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64D-TK-148	Solvent Tank	PVC70A/BSCBR1/2	38,541 gal	RTO
C64D-TK-150	Solvent Tank	PVC70A/BSCBR1/2	38,541 gal	RTO
C64D-TK-152	Solvent Tank	PVC70A/BSCBR1/2	38,541 gal	RTO
C64D-TK-154	Solvent Tank	PVC70A/BSCBR1/2	38,541 gal	RTO
C64D-TK-156	Solvent Tank	PVC70A/BSCBR1/2	38,541 gal	RTO
<i>Building C64E – Tank Module:</i>				
C64E-TK-158	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64E-TK-160	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64E-TK-162	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64E-TK-164	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64E-TK-166	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64E-TK-168	Solvent Tank	PVC70A/BSCBR1/2	38,551 gal	RTO
C64E-TK-170	Solvent Tank	PVC70A/BSCBR1/2	38,186 gal	RTO
C64E-TK-172	Solvent Tank	PVC70A/BSCBR1/2	38,186 gal	RTO
C64E-TK-174	Solvent Tank	PVC70A/BSCBR1/2	38,186 gal	RTO
C64E-TK-176	Solvent Tank	PVC70A/BSCBR1/2	38,186 gal	RTO
C64E-TK-178	Solvent Tank	PVC70A/BSCBR1/2	38,186 gal	RTO
<i>Building C64F – Tank Module:</i>				
C64F-TK-201	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-202	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-203	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-204	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-205	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-206	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-207	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-208	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-209	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-210	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-211	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-212	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-213	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-214	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-215	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-216	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-217	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO

C64F-TK-218	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-219	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-220	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-221	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-222	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO
C64F-TK-223	Solvent Tank	PVC70A/BSCBR1/2	19,494 gal	RTO
C64F-TK-224	Solvent Tank	PVC70A/BSCBR1/2	38,016 gal	RTO

\* This equipment is currently not connected to the RTO but is not in service. However, this equipment shall be tied into the RTO control system prior to storing a VOC or VOHAP.

### Emission Limitations and Standards

D.7.1 through D.7.4     **Reserved**

### Testing and Monitoring Requirements

D.7.5     **Reserved**

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3), 40 CFR 60.7, 40 CFR Part 60 Subpart Kb, and 40 CFR Part 63 Subpart GGG]

#### D.7.6 Record Keeping Requirements

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(a) Record Keeping Requirements

- (1) The record keeping requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.
- (2) Inspection and Maintenance Records - The Permittee shall maintain the following records from October 1, 2004 to the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers, of information and data related to Conditions D.7.1 and D.7.2 in T165-6462-00009, issued on October 1, 2004:
  - (A) Identification and explanation of all BPM solvent storage tanks unsafe to inspect, including a plan for when these tanks will be inspected;
  - (B) Identification and explanation of all BPM solvent storage tanks difficult to inspect, including a plan for when these tanks will be inspected;
  - (C) **Reserved**
  - (D) **Reserved**
  - (E) **Reserved**
  - (F) Periods of planned routine maintenance; and
  - (G) Records of BPM solvent storage tanks storing VOC/VOHAP with a vapor pressure less than 3.5 kPa.
- (3) SSM Records - The Permittee shall maintain the following records from October 1, 2004 to the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers:
  - (i) Records of the current and superseded versions of SSM Plan.

- (ii) Occurrence/duration records of each process malfunction.
  - (iii) Information to demonstrate conformance with each SSM are consistent with the procedures in the SSM Plan.
  - (iv) Records of actions taken during each SSM when different from SSM Plan.
- (4) LDAR Records - The record keeping requirements for the LDAR standards are described in Section E.1 of this permit.
- (5) Storage Tank Records – Pursuant to New Source Performance Standard for Volatile Organic Liquid Storage Vessels [40 CFR 60.116b(a) and (b)], the Permittee shall until the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers, keep readily accessible records of the dimensions and capacity for each BPM solvent storage tank.
- (6) Operating Plan – Pursuant to 40 CFR 60.115b, the Permittee shall until the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers, maintain a copy of the operating plan required by 40 CFR 60.113b for all tanks with design capacity greater than or equal to 75 cubic meters.

**SECTION D.8 SUPPORT OPERATIONS – WASTE TANK CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
<i>C9 Tank Farm:</i>				
C9-TK-1	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-2	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-3	Waste Tank	PVC70A/BSCBR1/2	42,000 gal	RTO
C9-TK-4	Waste Tank	PVC70A/BSCBR1/2	42,000 gal	RTO
C9-TK-6A	Waste Tank	PVC9BTK6A	1,900 gal	N/A
C9-TK-9	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-10	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-11	Waste Tank	PVC70A/BSCBR1/2	10,000 gal	RTO
C9-TK-12	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-13	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-14	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-15	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-16	Waste Tank	PVC70A/BSCBR1/2	10,000 gal	RTO
C9-TK-17	Waste Tank	PVC70A/BSCBR1/2	10,000 gal	RTO
C9-TK-19	Waste Tank	PVC70A/BSCBR1/2	248,000 gal	RTO
C9-TK-20	Waste Tank	PVC70A/BSCBR1/2	376,000 gal	RTO

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

**D.8.1 Standards for Waste Storage Tanks [40 CFR 63.1256(b), 40 CFR 63.685, 40 CFR 60.110b, and 326 IAC 2-2-3]**

The following streamlined standards for waste storage tanks satisfy the requirements of the Pharmaceutical MACT Standards for wastewater tanks [40 CFR 63.1256(b)], Volatile Organic Liquid Storage Vessel Standards [40 CFR 60.110b], OSWRO MACT Standards for waste tanks [40 CFR 63.685], and PSD BACT requirements [326 IAC 2-2-3]:

(a) Definition Standards:

- (1) A waste storage tank is defined as any waste management unit that is designed to contain an accumulation of affected wastewater or offsite waste material containing VOCs and/or VOHAP. Pressure vessels greater than 204.9 kPa without emissions to the atmosphere or vessels attached to motor vehicles are not waste storage tanks. For purposes of inspections in Condition D.8.1(c), waste storage tank includes any fixed roof, cover, and/or enclosure, and closed vent system section from the waste storage tank to the waste storage tank conservation vent.

(b) Operational Standards:

- (1) The Permittee shall route the vapors from each operating waste storage tank through a closed-vent system to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and associated closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.

(2) Waste storage tanks shall be of fixed-roof design.

(c) Inspection Standards:

(1) The Permittee shall conduct one-time Method 21 inspections on each new fixed roof waste storage tank not operated under negative pressure and not subject to LDAR within 150 days upon startup.

(2) The Permittee shall conduct semiannual visual inspections on the fixed roof and all openings of each waste storage tank for visible, audible, or olfactory indications of leaks.

(3) The Permittee shall initiate repair of any leak on a waste storage tank no later than 5 calendar days after identification, and complete the repair within 15 days after identification, unless:

(A) The repair is technically infeasible without a shutdown of an operation or process; or

(B) It is determined that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair.

Repairs delayed due to either of the causes described in (A) or (B) shall be completed by the end of the next shutdown.

**D.8.2 Exceptions to Standards for Waste Storage Tanks [40 CFR 63.1256(b), 40 CFR 63.685, and 326 IAC 2-2-3]**

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(a) The waste storage tanks less than 38 cubic meters are not subject to the standards established in Condition D.8.1(b) during periods of planned routine maintenance, as long as the planned routine maintenance activities do not exceed 240 hours per year.

(b) Waste storage tanks storing VOC/VOHAP with a vapor pressure less than 3.5 kPa and tanks with a capacity less than 40 cubic meters that are used to store wastewater with a vapor pressure less than 76.6 kPa where the wastewater is generated only from stormwater or drips, leaks or spills from non-process equipment, are not subject to the requirements of Conditions D.8.1(b)(1) and D.8.1(c).

(c) Waste storage tanks that are unsafe or difficult to monitor are not subject to the requirements of Condition D.8.1(c).

**D.8.3 Leak Detection and Repair (LDAR) Standards [40 CFR Part 61, Subpart V and 326 IAC 2-2-3]**

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The LDAR standards that apply to components associated with the waste storage tanks are described in Section E.2 of this permit.

**D.8.4 Startup, Shutdown and Malfunction Requirements [40 CFR 63.1259(a)(3), 40 CFR 63.697(b)(3), 326 IAC 2-2-3, 40 CFR 63.6(e) and 40 CFR 63.8(c)]**

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The NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e) and 63.8(c)] shall be used to satisfy the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT [40 CFR 63.697(b)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].

(a) Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop an SSM Plan to ensure that processes are operated and maintained in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i), and that all malfunctions are corrected as soon as practicable after their occurrence in order to minimize excess emissions. The SSM Plan shall contain the following information:

- (1) Detailed plans and/or procedures for operating and maintaining the process during periods of SSM; and
  - (2) Corrective action program for malfunctioning processes.
- (b) The startup, shutdown and malfunction (SSM) requirements for the RTO control system, and associated closed-vent system, are described in Section D.11 of this permit.

### **Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.8.5 Testing and Monitoring Requirements**

The testing and monitoring requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3), 40 CFR 60.7, 40 CFR Part 60 Subpart Kb, and 40 CFR Part 63 Subpart GGG]**

#### **D.8.6 Record Keeping and Reporting Requirements**

(a) Record Keeping Requirements

- (1) RTO Control System Records - The record keeping requirements for the RTO control system, and associated closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.
- (2) Inspection and Maintenance Records - The Permittee shall maintain the following records of information and data related to Conditions D.8.1(c) and D.8.2:
  - (A) Identification and explanation of all waste storage tanks unsafe to inspect, including a plan for when these tanks will be inspected;
  - (B) Identification and explanation of all waste storage tanks difficult to inspect, including a plan for when these tanks will be inspected;
  - (C) Visual inspection log of waste storage tanks, including the date of inspection and a statement that no leaks were detected, if applicable;
  - (D) One-time Method 21 inspection log of each waste storage tank, including the date of inspection and a statement that no leaks were detected, if applicable;
  - (E) Information on each waste storage tank inspection during which a leak is detected, including:
    - (i) Instrument identification numbers, operator name or initials, and identification of the equipment;
    - (ii) Date the leak was detected and the date of the first attempt to repair the leak;
    - (iii) Maximum instrument reading measured after leak is successfully repaired or determined to be nonrepairable;
    - (iv) Reason for any delay of repair if leak not repaired within 15 calendar days after discovery of the leak;

- (v) Name, initials, or other form of identification of person whose decision it was that repair could not be effected without a shutdown;
  - (vi) Expected date of successful repair of leak if leak not repaired within 15 calendar days after discovery of leak;
  - (vii) Dates of shutdowns that occur while the equipment is unrepaired; and
  - (viii) Date of successful repair of the leak.
- (F) Periods of planned routine maintenance; and
- (G) Records of waste storage tanks storing VOC/VOHAP with a vapor pressure less than 3.5 kPa.
- (3) SSM Records - The Permittee shall maintain the following records:
- (A) Records of the current and superseded versions of SSM Plan.
  - (B) Occurrence/duration records of each process malfunction.
  - (C) Information to demonstrate conformance with each SSM are consistent with the procedures in the SSM Plan.
  - (D) Records of actions taken during each SSM when different from SSM Plan.
- (4) LDAR Records - The record keeping requirements for the LDAR standards are described in Section E.2 of this permit.
- (5) Storage Tank Records - Pursuant to New Source Performance Standard for Volatile Organic Liquid Storage Vessels [40 CFR 60.116b(a) and (b)], the Permittee shall, for the life of the source, keep readily accessible records of the dimensions and capacity for all applicable waste storage tanks.
- (6) Operating Plan – Pursuant to 40 CFR 60.115b, the Permittee shall, for the life of the source, maintain a copy of the operating plan required by 40 CFR 60.113b for all tanks with design capacity greater than or equal to 75 cubic meters.
- (b) Quarterly Reporting Requirements
- (1) The following streamlined quarterly reporting requirements shall satisfy the Pharmaceutical MACT standards [40 CFR 63.1260(g), (i), and (j)] and the PSD BACT requirements [326 IAC 2-1.1-11]:
    - (A) Inspections conducted during which a leak was detected;
    - (B) Periods of planned routine maintenance; and
    - (C) SSM summary reports for the processes.
  - (2) The reporting requirements for the RTO control system, and associated closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.
  - (3) The reporting requirements for the LDAR standards are described in Section E.2 of this permit.

- (4) Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.

(c) Immediate Reporting Requirements

The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the reporting requirements under the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].

- (1) Any time an action taken by the Permittee during an SSM event of a process is not consistent with the procedures specified in the SSM Plan and the SSM event results in an exceedance of a relevant emission standard, the Permittee shall report the actions taken for that event. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.
- (2) Within 7 working days after the end of an SSM event of a process where an action taken by the Permittee is not consistent with the procedures specified in the SSM Plan, the Permittee shall submit a letter containing the following information in accordance with 40 CFR 63.10(d)(5):
  - (A) Name, title and signature of responsible official certifying accuracy;
  - (B) Explanation of the circumstances for the event;
  - (C) Reason for not following the SSM Plan; and
  - (D) Report any excess emissions and/or parameter monitoring exceedances that are believed to have occurred.

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

**D.8.7 Modifications and Construction: Advance Approval of Permit Conditions**

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- (a) The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.
- (b) The Permittee may construct and install new emission units of the types described in this D section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

**SECTION D.9 SUPPORT OPERATIONS – WASTE CONTAINER CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
<b>SMALL WASTE CONTAINERS*:</b>				
A small waste container, such as a drum, is defined as containing affected wastewater or offsite waste material containing VOC/VOHAP and having a capacity greater than 0.1 cubic meters (26.4 gallons) and equal to or less than 0.42 cubic meters (110.5 gallons). Identification of these types of containers have not been individually listed given they are portable and continually change. Each onsite wastewater container and offsite waste container with this description type will follow the requirements outlined in this section.				
<b>LARGE WASTE CONTAINERS*:</b>				
A large waste container, such as tanker or melon, is defined as containing affected wastewater or offsite waste material containing VOC/VOHAP and having a capacity greater than 0.42 cubic meters (110.5 gallons). Identification of these types of containers have not been individually listed given they are portable and continually change. Each container with this description type will follow the requirements outlined in this section.				
* Emission units marked with an asterisk are insignificant activities as defined by 326 IAC 2-7-1(21)(A) through (C).				

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

**D.9.1 Standards for Small Waste Containers [40 CFR 63.1256(d), 40 CFR 63.688, 326 IAC 2-2-3]**

The following streamlined standards for small waste containers satisfy the requirements of the Pharmaceutical MACT Standards for wastewater containers [40 CFR 63.1256(d)], OSWRO MACT Standards for waste containers [40 CFR 63.688], and PSD BACT requirements [326 IAC 2-2-3]:

- (a) Definition Standards:
  - (1) A small waste container is defined as any portable unit containing affected wastewater or offsite waste material containing VOC/VOHAP at concentrations greater than 500 ppmw with a storage capacity of greater than 0.1 cubic meters (26.4 gallons) and less than or equal to 0.42 cubic meters (110.5 gallons).
- (b) Operational Standards:
  - (1) The cover and all openings on each waste container shall be maintained in the closed position, except when adding material, removing material, accessing material for non-transfer-related routine activities, openings caused from a pressure relief device, or opening of a safety device.
  - (2) Each waste container containing VOC/VOHAP shall meet existing Department of Transportation (DOT) specifications and testing requirements under 49 CFR Part 178.
- (c) Inspection Standards:

- (1) Initial and semiannual visual inspections shall be conducted for improper work practices and control equipment failures.
- (2) Containers that are unsafe or difficult to monitor are not subject to the inspection requirements of Condition D.9.1(c)(1).
- (3) The Permittee shall attempt to repair any defect within 24 hours after detection of the defective container and complete the repair within 5 calendar days after detection. If repair of a defect cannot be completed within 5 calendar days, then the waste shall be removed from the container and the container shall not be used to manage waste until the defect is repaired.

D.9.2 Standards for Large Waste Containers [40 CFR 63.1256(d), 40 CFR 63.688, 326 IAC 2-2-3]

The following streamlined standards for large waste containers satisfy the requirements of the Pharmaceutical MACT Standards for wastewater containers [40 CFR 63.1256(d)], OSWRO MACT Standards for waste containers [40 CFR 63.688], and PSD BACT requirements [326 IAC 2-2-3]:

(a) Definition Standards:

- (1) A large waste container is defined as any portable unit containing affected wastewater or offsite waste material containing VOC/VOHAP at concentrations greater than 500 ppmw with a storage capacity of greater than 0.42 cubic meters (110.5 gallons).

(b) Operational Standards:

- (1) The cover and all openings on each large waste container shall be maintained in the closed position, and without leaks, except when adding material, removing material, accessing material for non-transfer-related routine activities, opening from a pressure relief device, and opening of a safety device.
- (2) A submerged fill pipe shall be used when pumping affected wastewater or offsite liquid waste into a large waste container. The submerged fill pipe outlet shall extend to no more than 6 inches or within two fill pipe diameters of the bottom of the container while the container is being filled.

(c) Inspection Standards:

- (1) One-time Method 21 inspections shall be conducted on each new large waste container within 150 days upon first onsite usage.
- (2) Initial and semiannual visual inspections shall be conducted for:
  - (A) Improper work practices;
  - (B) Control equipment failures; and
  - (C) Visible, audible, or olfactory indications of leaks.
- (3) Containers that are unsafe or difficult to monitor are not subject to the inspection requirements of Conditions D.9.2(c)(1) and (2).
- (4) The Permittee shall attempt to repair any defect within 24 hours after detection of the defective container and complete the repair within 5 calendar days after detection. If repair of a defect cannot be completed within 5 calendar days, then

the waste shall be removed from the container and the container shall not be used to manage waste until the defect is repaired.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3), 40 CFR Part 63 Subpart GGG, 40 CFR Part 63 Subpart DD]**

**D.9.3 Record Keeping and Reporting Requirements**

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(a) Record Keeping Requirements

The Permittee shall maintain the following records for inspections required by Conditions D.9.1 and D.9.2:

- (1) Identification and explanation of all containers unsafe to inspect, including a plan for when these containers will be inspected;
- (2) Identification and explanation of all containers difficult to inspect, including a plan for when these containers will be inspected;
- (3) Visual inspection log of waste containers, including the date of inspection and a statement that no leaks were detected, if applicable;
- (4) One-time Method 21 inspection log of each large waste container, including the date of inspection and a statement that no leaks were detected, if applicable;
- (5) Information on each waste container inspection during which a leak is detected, including:
  - (A) Instrument identification numbers, operator name or initials, and identification of the equipment;
  - (B) Date the leak was detected and the date of the first attempt to repair the leak; and
  - (C) Date of successful repair of the leak or date material removed from container.

(b) Quarterly Reporting Requirements

- (1) The Permittee shall include the inspection records specified in Condition D.9.3(a)(5) for each inspection conducted during which a leak was detected in the next quarterly report.
- (2) Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

**D.9.4 Modifications and Construction: Advance Approval of Permit Conditions**

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- (a) The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.
- (b) The Permittee may construct and install new emission units of the types described in this D section without obtaining a source modification approval (otherwise required by

326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

**SECTION D.10 SUPPORT OPERATIONS – INDIVIDUAL DRAIN SYSTEM CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The following information is descriptive information and does not constitute enforceable conditions:				
Unit ID	Unit Description	Stack/Vent	Nominal Capacity	Control Device
<i>Building 63:</i>				
2 <sup>nd</sup> floor drain system*	Drains	N/A	N/A	Water Seals
* Emission units marked with an asterisk are insignificant activities as defined by 326 IAC 2-7-1(21)(A) through (C).  The Permittee permanently shut down the emission unit that was listed in Section D.10.				

**Emission Limitations and Standards**

D.10.1 through D.10.2 **Reserved**

**Testing and Monitoring Requirements**

D.10.3 **Reserved**

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3), 40 CFR Part 63 Subpart GGG]**

D.10.4 Record Keeping Requirements

- 
- (a) Record Keeping Requirements
    - (1) **Reserved**
    - (2) **Reserved**
    - (3) SSM Records - The Permittee shall maintain the following records from October 1, 2004 to the date on which the Permittee decided to permanently shut-down the individual drain system operations:
      - (A) Records of the current and superseded versions of SSM Plan.

## SECTION D.11 CONTROL SYSTEMS – RTO OPERATIONS

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

The information describing the processes contained in the following facility description is descriptive information and does not constitute enforceable conditions:

The RTO control system consists of two Regenerative Thermal Oxidizers, identified as RTO1 and RTO2, each equipped with caustic scrubbing systems, and each exhausting to individual stacks.

The closed-vent system (CVS) associated with the RTO control system begins at the outlet side of the tank conservation vents of those tank modules exhausting to the RTO fume transport system and ends at the entrance of the RTO control system.

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

D.11.1 Control Device and Closed-Vent System Standards [40 CFR 63.1256(b) and (h), 63.1258(b), 40 CFR 63.685(c) and (d), 63.690(b), 63.693(f), 40 CFR 60.112b(a) and 60.113b(c), 326 IAC 2-2-3]

- (a) RTO Control Device Standards – The RTO control device standards shall apply at all times the unit is burning waste fume streams, except as provided in Condition D.11.2(a)(2):
- (1) Carbon Monoxide (CO) – In order to satisfy PSD BACT requirements [326 IAC 2-2-3], CO emissions at the outlet of the RTO system shall not exceed a 24-hour daily average of 73 parts per million by volume (ppmv).
  - (2) Oxides of Nitrogen (NO<sub>x</sub>) – In order to satisfy PSD BACT requirements [326 IAC 2-2-3], NO<sub>x</sub> emissions at the outlet of the RTO system shall not exceed a 24-hour daily average of 91 ppmv.
  - (3) Sulfur Dioxide (SO<sub>2</sub>) – In order to satisfy PSD BACT requirements [326 IAC 2-2-3], SO<sub>2</sub> emissions, as measured at the outlet of the RTO system, shall meet one of the following emission standards:
    - (A) Control Efficiency Standard:
      - (i) The SO<sub>2</sub> emissions shall be reduced by a control efficiency of 97.5% or more at the outlet of the RTO system;
      - (ii) The 24-hour daily average scrubber liquid pH of the caustic scrubbing system shall not be less than the value established from a compliant stack test;
      - (iii) The 24-hour daily average scrubber liquid recirculation flow rate of the caustic scrubbing system shall not be less than the value established from a compliant stack test; and
      - (iv) The 24-hour daily average scrubber caustic flow rate of the caustic scrubbing system shall not exceed the value established from a compliant stack test.
    - (B) Concentration Emission Standard:
      - (i) The SO<sub>2</sub> emissions shall not exceed a 24-hour daily average of 100 ppmv at the outlet of the RTO system; and

- (ii) The Permittee shall install and certify an SO<sub>2</sub> CEMS prior to using the concentration emission standard.
- (4) Volatile Organic Compounds (VOC)/Volatile Organic Hazardous Air Pollutant (VOHAP) – In order to satisfy the Pharmaceutical MACT requirements [40 CFR 63.1256(b) and (h), and 63.1258(b)], the Offsite Waste and Recovery Operations MACT requirements [40 CFR 63.685(c) and (d), 63.690(b), and 63.693(f)], the PSD BACT requirements [326 IAC 2-2-3], and the New Source Performance Standards for Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.112b(a) and 60.113b(c)], the Permittee shall meet one of the following streamlined VOC/VOHAP emission standards:
- (A) Control Efficiency Standard:
    - (i) The VOC/VOHAP emissions shall be reduced by a control efficiency of 98% or more at the outlet of the RTO system;
    - (ii) The 24-hour daily average RTO combustion chamber temperature shall not be less than the value established from a compliant stack test; and
    - (iii) The solvent concentration going to the RTO, measured as a percent of the lower explosive limit (LEL), shall not exceed a 24-hour daily average established from a compliant stack test.
  - (B) Concentration Emission Standard:
    - (i) The VOC/VOHAP emissions shall not exceed 20 ppmv over a 24-hour daily average at the outlet of the RTO system, measured via a TOC CEMS;
    - (ii) The 24-hour daily average RTO combustion chamber temperature shall not be less than the value established from a compliant stack test;
    - (iii) The RTO combustion chamber residence time shall not be less than 0.75 seconds over a 24-hour daily average, which is equivalent to a maximum 24-hour daily average stack exhaust air flow rate of 3,340 standard cubic feet per second; and
    - (iv) The Permittee shall install and certify a TOC CEMS prior to using the concentration emission standard.
- (5) Hydrogen Halide/Halogen and Fluorides – In order to satisfy the Pharmaceutical MACT requirements [40 CFR 63.1256(b) and (h), and 63.1258(b)] and PSD BACT requirements for fluorides [326 IAC 2-2-3], the Permittee shall meet one of the following hydrogen halide and halogen emission standards:
- (A) Concentration Emission Standard:
    - (i) The hydrogen halide and halogen emissions, which includes hydrogen fluoride emissions, shall not exceed 20 ppmv over a 24-hour daily average at the outlet of the RTO system, measured via a HCl CEMS; or
  - (B) Control Efficiency Standard:

- (i) The hydrogen halide and halogen emissions, which includes hydrogen fluoride emissions, shall be reduced by a control efficiency of 98% or more at the outlet of the RTO system;
  - (ii) The 24-hour daily average scrubber liquid pH of the caustic scrubbing system shall not be less than the value established from a compliant stack test;
  - (iii) The 24-hour daily average scrubber liquid recirculation flow rate of the caustic scrubbing system shall not be less than the value established from a compliant stack test; and
  - (iv) The 24-hour daily average scrubber caustic flow rate of the caustic scrubbing system shall not exceed the value established from a compliant stack test.
  
- (b) RTO Closed-Vent System Inspection Standards – The following inspection standards shall apply to the RTO closed-vent system (CVS), except as provided in Condition D.11.2(b):
  - (1) The Permittee shall comply with the following closed-vent system inspection requirements to satisfy the Pharmaceutical MACT requirements [40 CFR 63.1256(b)(3) and 63.1258(h)], the Offsite Waste MACT requirements [40 CFR 63.685(g), 63.690(b), 63.693(b) and (c), and 63.695(c)], and the PSD BACT requirements [326 IAC 2-2-3]:
    - (A) Initial one-time Method 21 inspections shall be conducted on new portions of the RTO closed-vent system not operated under negative pressure within 150 days after startup.
    - (B) Portions of the CVS that are operated under negative pressure shall be equipped with a pressure gauge or other pressure measurement/detection. The data output must be viewable from a readily accessible location to verify that negative pressure is being maintained when waste fume streams are going to the control system.
    - (C) Annual visual inspections of the RTO closed-vent system shall be performed for visible cracks, holes or gaps, loose connections, and broken or missing caps.
    - (D) Repair of any leak detected on the RTO closed-vent system shall be initiated no later than 5 calendar days after identification, and completed within 15 days after identification, unless:
      - (i) The repair is technically infeasible without a shutdown of an operation or process; or
      - (ii) It is determined that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair.
  
  - (2) The Permittee shall monitor each bypass line on the RTO closed-vent system to satisfy the Pharmaceutical MACT requirements [40 CFR 63.1252(b) and 63.1258(b)], the Offsite Waste MACT requirements [40 CFR 63.685(g), 63.690(b), and 63.693(c)], and the PSD BACT requirements [326 IAC 2-2-3] using one of the following methods:

Repairs delayed due to either of the causes described in (i) or (ii) shall be completed by the end of the next shutdown.

- (A) Install and monitor the position of the closed-vent system bypass valve at least once every 15 minutes, where the closed position means there is no bypass flow; or
- (B) Secure the bypass line valve in the closed position with a car seal or lock and key type configuration. Monthly visual inspections of seal or locking device shall be performed to ensure the seal is not broken or the valve is in the closed position and the vent stream is not diverted through the bypass line.

D.11.2 Exceptions to RTO Control System Standards [40 CFR 63.1260(g), 40 CFR 63.6(e)(3) and 63.8(c), 40 CFR 63.681, 63.685(g) and 63.693(b), and 326 IAC 2-2-3]

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- (a) Exceptions to RTO Control Device Operational Standards – The following streamlined standards satisfy the Pharmaceutical MACT standards [40 CFR 63.1260(g)], Offsite Waste MACT standards [40 CFR 63.681, 63.685(g) and 63.693(b)], and PSD BACT requirements [326 IAC 2-2-3]:
  - (1) The Permittee may open a safety device and vent directly to the atmosphere at any time conditions require it to do so to avoid unsafe conditions.
  - (2) The provisions of Conditions D.11.1(a) shall not apply during periods of startup, shutdown or malfunction that preclude the Permittee from complying with Condition D.11.1(a), provided the Permittee complies with the provisions of the startup, shutdown, and malfunction plan (SSM Plan) required by Condition D.11.3.
- (b) Exceptions to RTO Closed-Vent System Inspection Standards – The following streamlined standards satisfy the Pharmaceutical MACT standards [40 CFR 63.1258(h)(6) and (7)], and PSD BACT requirements [326 IAC 2-2-3]:
  - (1) The Permittee is not required to inspect if unsafe or difficult to inspect.

D.11.3 Startup, Shutdown, and Malfunction Requirements for RTO Control System [40 CFR 63.1259(a)(3), 40 CFR 63.697(b)(3), 40 CFR 63.6(e)(3), 40 CFR 63.8(c) and 326 IAC 2-2-3]

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- (a) The NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)] and PSD BACT requirements [326 IAC 2-1.1.11].
- (b) Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop an SSM Plan to ensure that the RTO control system, including associated CEMS and CMS equipment, is operated and maintained in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i), and that all malfunctions are corrected as soon as practicable after their occurrence in order to minimize excess emissions. The SSM Plan shall contain the following information:
  - (1) Detailed procedures for operating and maintaining the RTO system, including associated CEMS and CMS equipment, during periods of startup, shutdown, and malfunction; and
  - (2) Corrective action program for malfunctioning process and air pollution control equipment, including associated CEMS and CMS equipment.

## Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.11.4 Continuous Emissions Monitoring System (CEMS) Requirements [40 CFR Part 60, Appendix B and Appendix F, 40 CFR 60.113b(c), 40 CFR 63.1258(b), 40 CFR 63.693(f), 40 CFR 63.8, 326 IAC 2-1.1-11, 326 IAC 2-7-24, 326 IAC 3-5]

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- (a) CO and NO<sub>x</sub> CEMS Operation Requirements – The following requirements shall apply when burning waste fume streams:
- (1) The Permittee shall install and operate the CO and NO<sub>x</sub> CEMS in accordance with the quality assurance/quality control (QA/QC) criteria set forth in 40 CFR Part 60, Appendix B and 40 CFR Part 60, Appendix F, Procedure 1.
  - (2) Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.
  - (3) The Startup, Shutdown, and Malfunction (SSM) Plan required by Condition D.11.3(b) shall include procedures for monitoring and recording the following information during times of CO or NO<sub>x</sub> CEMS malfunction:
    - (A) When the CO CEMS malfunctions, the Permittee shall monitor and record the RTO combustion chamber temperature and exhaust air flow rate as required by Conditions D.11.6(a)(1) and (3), respectively.
    - (B) When the NO<sub>x</sub> CEMS malfunctions, the Permittee shall monitor and record the combustion chamber temperature and exhaust air flow rate from the RTO as required by Conditions D.11.6(a)(1) and (3), and assess NO<sub>x</sub> emissions using process knowledge to determine whether the quantity of nitrogen fed into the RTO during that time could have exceeded the worst case 24-hour daily average nitrogen feed rate of 1,085 pounds per hour that formed the basis of the NO<sub>x</sub> BACT limit.
- (b) SO<sub>2</sub> CEMS Operation Requirements – The following requirements shall apply when burning waste fume streams and applying the SO<sub>2</sub> concentration emission standard:
- (1) The Permittee shall install and operate the SO<sub>2</sub> CEMS in accordance with the quality assurance/quality control (QA/QC) criteria set forth in 40 CFR Part 60, Appendix B and 40 CFR Part 60, Appendix F, Procedure 1.
  - (2) Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.
  - (3) The Startup, Shutdown, and Malfunction (SSM) Plan required by Condition D.11.3(b) shall include procedures for monitoring and recording the following information during times of SO<sub>2</sub> CEMS malfunction:
    - (A) When SO<sub>2</sub> CEMS malfunctions, the Permittee shall monitor and record the scrubber liquid recirculation flow rate and caustic flow rate as required by Conditions D.11.6(b)(1)(B) and (C) respectively and the scrubber liquid pH as required by Condition D.11.6(b)(1)(A).
- (c) TOC CEMS Operation Requirements – When applying the TOC concentration emission standard, the following requirements shall apply when burning waste fume streams and represent the streamlined requirements of the Pharmaceutical MACT standards [40 CFR 63.1258(b)], Offsite Waste MACT standards [40 CFR 63.693(f)], NESHAP General Provisions monitoring requirements [40 CFR 63.8(c)], NSPS Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.113b(c)], PSD BACT requirements for VOCs

[326 IAC 2-1.1-11], and emission monitoring requirements for MACT and PSD sources [326 IAC 3-5-1(b) and (d)]:

- (1) The Permittee shall install and operate the TOC CEMS in accordance with the QA/QC criteria set forth in 40 CFR Part 60, Appendix B, 40 CFR 63.1258(b)(1)(x), and 40 CFR 63.8.
  - (2) Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.
- (d) HCl CEMS Operation Requirements – When applying the hydrogen halides and halogens concentration emission standard, the following requirements shall apply when burning waste fume streams and represent the streamlined requirements of the Pharmaceutical MACT standards for hydrogen halides and halogens [40 CFR 63.1258(b)], NESHAP General Provisions monitoring requirements [40 CFR 63.8(c)], and PSD BACT requirements for fluorides [326 IAC 2-1.1-11]:
- (1) The Permittee shall install and operate the HCl CEMS in accordance with the QA/QC criteria set forth in 40 CFR Part 60, Appendix B, 40 CFR 63.1258(b), and 40 CFR 63.8; or in accordance with an Alternative Monitoring Plan which must be submitted to U.S. EPA for approval.
  - (2) Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.
- (e) Continuous Emissions Monitoring System (CEMS) Standard Operating Procedures (SOP) – The Permittee shall prepare and implement a SOP that provides step-by-step procedures and operations of the CEMS in accordance with 326 IAC 3-5-4(a), and that includes preventive maintenance procedures and corrective maintenance procedures that will be taken to ensure continuous operation and to minimize malfunctions.

D.11.5 Performance Testing Requirements [40 CFR 60.113b(c), 40 CFR 63.7, 40 CFR 63.1257(b) and (d) and 63.1258(b)(3), 40 CFR 63.693(f), 326 IAC 3-6-3(c), and 326 IAC 2-1.1-11]

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- (a) Initial Comprehensive Performance Test Requirements:
- (1) VOC/VOHAP – Initial testing was performed on October 1 and 3, 2002 to satisfy requirements for the Pharmaceutical MACT standards [40 CFR 63.1257(b) and (d) and 63.1258(b)]. These tests shall also satisfy the Offsite Waste MACT standards [40 CFR 63.693(f)], Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.113b(c)], PSD BACT requirements [326 IAC 2-1.1-11], and emission testing requirements for MACT sources [326 IAC 3-6-3(c)].
  - (2) Hydrogen Halide/Halogen – Initial testing was performed on February 27 and 28, 2003 to satisfy requirements for the Pharmaceutical MACT standards [40 CFR 63.1258(b)]. These tests shall also satisfy the PSD BACT requirements for fluorides [326 IAC 2-1.1-11].
  - (3) Sulfur Dioxide (SO<sub>2</sub>) – The following requirements satisfy the PSD BACT requirements for SO<sub>2</sub> [326 IAC 2-1.1-11]:
    - (A) If complying with the control efficiency standard, the Permittee shall conduct an initial performance test within 120 days of actual SO<sub>2</sub> emissions from the RTOs (before controls) exceeding 40 tons in the last 12-month period.
    - (B) The Permittee shall submit a notification of the performance test and a site-specific test plan at least 60 days in advance of the intended performance test date.

- (C) The operating parameters defined in Condition D.11.1(a)(3)(A) shall be monitored during the performance test to establish the 24-hour daily average parametric limits, according to the requirements of 40 CFR 63.1258(b)(3)(ii).
- (D) The Permittee shall submit the performance test reports, and upon request, the CMS performance evaluation, within 45 days following the test. The Permittee is allowed an extension if a reasonable explanation is provided within 40 days following the test.

(b) Subsequent Comprehensive Performance Test Requirements:

If the Permittee is complying with the control efficiency emission standards for VOC/VOHAP, SO<sub>2</sub> and Hydrogen Halide/Halogens, the performance tests shall be repeated at least once every fifth year from the date of the most recent valid compliance demonstration.

D.11.6 Parametric Continuous Monitoring System (CMS) Requirements [40 CFR 63.8(c), 40 CFR 60.113b(c), 40 CFR 63.1257(b), 63.1258(a) and (b), and 63.1260(e), 40 CFR 63.693(b), 326 IAC 2-1.1-11, 326 IAC 2-7-24, and 326 IAC 3-5-5(d)]

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- (a) VOC/VOHAP CMS Operation Requirements - The following requirements shall apply only when burning waste fume streams and represent the streamlined requirements of the Pharmaceutical MACT standards [40 CFR 63.1258(a) and (b)], Offsite Waste MACT standards [40 CFR 63.693(b)], Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.113b(c)], PSD BACT requirements [326 IAC 2-1.1-11], and continuous monitoring requirements for flow rate [326 IAC 3-5-5(d)]:
  - (1) RTO Combustion Chamber Temperature – The Permittee shall install and operate the RTO combustion chamber temperature CMS in accordance with 40 CFR 63.8(c), except where otherwise noted in Clinton Labs' Pharma MACT Pre-compliance Report, submitted on April 18, 2002, and subsequently revised on September 23 and November 15, 2002.
  - (2) FTS Solvent Concentration – When applying the VOC/VOHAP control efficiency standard, the Permittee shall install and operate a CMS to measure solvent concentration, as a percentage of the lower explosive limit (LEL), in accordance with 40 CFR 63.8(c), except where otherwise noted in Clinton Labs' Pharma MACT Pre-compliance Report, submitted on April 18, 2002, and subsequently revised on September 23 and November 15, 2002.
  - (3) Flow Rate Monitor – When applying the VOC/VOHAP concentration emission standard, the Permittee shall install and operate an air flow rate CMS at the stack exhaust in accordance with 326 IAC 3-5-5(d).
  - (4) Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.
- (b) Hydrogen Halide/Halogen and Fluorides CMS Requirements -The following requirements shall apply only when burning waste fume streams and represent the streamlined requirements of the Pharmaceutical MACT standards for hydrogen halides and halogens [40 CFR 63.1257(b), 63.1258(b), and 63.1260(e)] and the PSD BACT requirements for fluorides [326 IAC 2-1.1-11]:
  - (1) When applying the control efficiency standard, the Permittee shall install and operate the following CMSs in accordance with 40 CFR 63.8(c):
    - (A) Scrubber liquid pH monitor;

- (B) Scrubber liquid recirculation flow rate monitor; and
  - (C) Scrubber caustic flow rate monitor.
- (2) Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.
- (c) CMS Quality Control (QC) Program – The Permittee shall prepare and implement a Quality Control (QC) Program for the CMS units in accordance with 40 CFR 63.8(d).

**D.11.7 Excursions [40 CFR 63.1258(b)(7), 40 CFR 63.695(e)(4), 326 IAC 2-1.1-11]**

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- (a) Pursuant to the Pharmaceutical MACT standards [40 CFR 63.1258(b)(7)] and the Offsite Waste MACT [40 CFR 63.695(e)(4)], and to satisfy the monitoring for the BACT requirement [326 IAC 2-1.1-11], excursions are defined as follows and apply to the CEMS and CMS required by Conditions D.11.4(c) and (d), and D.11.6, respectively:
- (1) When the period of control device operation (i.e., receiving waste fume streams) is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours.
  - (2) When the period of control device operation (i.e., receiving waste fume streams) is less than 4 hours in an operating day and more than one of the hours during the period of operation does not constitute a valid hour of data due to insufficient monitoring data.
- (b) A valid hour requires at least one data point for each 15-minute period in the operating hour.

**D.11.8 Minimum Data Requirements – CO, NO<sub>x</sub> and SO<sub>2</sub> CEMS [326 IAC 2-1.1-11]**

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The following defines when CEMS data must be supplemented with data required by Conditions D.11.4(a)(3), D.11.4(b)(3), D.11.9(a)(1)(L), and D.11.9(b)(2):

- (a) When the period of control device operation (i.e., receiving waste fume streams) is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours, or
- (b) When the period of control device operation (i.e., receiving waste fume streams) is less than 4 hours in an operating day and more than one of the hours during the period of operation does not constitute a valid hour of data due to insufficient monitoring data.
- (c) Monitoring data are insufficient to constitute a valid hour of data if measured values are unavailable for any of the required 15-minute periods within the hour.

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

**D.11.9 Record Keeping and Reporting Requirements**

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- (a) Record Keeping Requirements

The Permittee shall maintain the following records:

- (1) Control Device (RTO) Records – The following streamlined record keeping requirements satisfy the Pharmaceutical MACT requirements [40 CFR 63.1259], the Offsite Waste MACT standards [40 CFR 63.696], Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.115b], PSD BACT requirements [326 IAC 2-1.1-11 and 326 IAC 2-7-5(3)], and the continuous emission monitoring and performance testing requirements [326 IAC 3-5 and 3-6]:

- (A) Log of the operating scenario (i.e., concentration standard or control efficiency standard) applied to satisfy the VOC/VOHAP and hydrogen halide and halogen emission standards required by Conditions D.11.1(a)(4) and D.11.1(a)(5) in an On-Site Implementation Log (OSIL);
  - (B) Records of the current and superseded versions (during previous 5-year period) of SSM Plan;
  - (C) Description of worst-case operating conditions, if complying with control efficiency standard;
  - (D) Results of control device performance tests and CMS performance evaluations, if complying with control efficiency standard;
  - (E) Records of all required CMS and CEMS data;
  - (F) Records of each CMS and CEMS calibration check;
  - (G) Maintenance records for each control device, CMS, and CEMS;
  - (H) Occurrence/duration records of each control device malfunction, CMS malfunction, and CEMS malfunction;
  - (I) Information to demonstrate conformance with each SSM are consistent with procedures in the SSM Plan;
  - (J) Records of actions taken during each SSM when different from SSM Plan;
  - (K) Record of the current standard operating procedure (SOP) for the RTO CEMS units and quality control (QC) program for CMS units; and
  - (L) For days when Condition D.11.8 requires that CEMS data must be supplemented, documentation of the information required by Conditions D.11.4(a)(3) and D.11.4(b)(3).
- (2) Closed-Vent System (RTO CVS) Records – The following streamlined record keeping requirements satisfy the Pharmaceutical MACT requirements [40 CFR 63.1259], the Offsite Waste MACT standards [40 CFR 63.696], Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.115b], PSD BACT requirements [326 IAC 2-1.1-11 and 326 IAC 2-7-5(3)], and the continuous emission monitoring and performance testing requirements [326 IAC 3-5 and 3-6]:
- (A) Hourly records of bypass flow indicator operating status and the time and duration of all diversions detected by the bypass flow indicator, if complying via this method;
  - (B) Monthly visual inspection records of bypass line valves and the occurrence of all periods the valve position has changed, if complying via this method;
  - (C) Record of each CVS component that is unsafe to inspect, and a plan for inspecting the component as frequently as practicable during safe-to-inspect times;
  - (D) Record of each CVS component that is difficult to inspect and a written plan for inspecting the component at least once every five years;

- (E) Record of the following information if no leaks are detected during the applicable Method 21 inspection and CVS annual visual inspections:
    - (i) Date each inspection was performed; and
    - (ii) Statement for each inspection that no leaks were detected.
  - (F) For each part of the CVS not operated under negative pressure, record of the following information for all leaks detected during the initial Method 21 inspection:
    - (i) Identification of leaking equipment;
    - (ii) Instrument ID and operator name or initials;
    - (iii) Date the leak was detected and date of first attempt to repair leak;
    - (iv) Maximum instrument reading after leak from initial Method 21 is successfully repaired or declared non-repairable; and
    - (v) Record of reason for any delay of repair, name of person responsible for decision, expected date of repair, dates of shutdowns when repair is made and date of successful repair of leak.
  - (G) Record of the following information for all leaks detected from the CVS annual visual inspection:
    - (i) Identification of leaking equipment;
    - (ii) Date leak was detected and first attempt to repair leak; and
    - (iii) Record of reason for any delay of repair, name of person responsible for decision, expected date of repair, dates of shutdowns when repair is made and date of successful repair of leak.
- (b) Quarterly Periodic Reports
- (1) The following streamlined reporting requirements satisfy the Pharmaceutical MACT requirements [40 CFR 63.1260(g)] and the Offsite Waste MACT standards [40 CFR 63.697], which reference the MACT General Provisions [40 CFR 63.7 through 63.10], Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.115b], PSD BACT requirements [326 IAC 2-1.1-11], and the continuous emission monitoring requirements [326 IAC 3-5]:
    - (A) Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent;
    - (B) If total duration of excess emissions, parameter exceedances, or excursions is 1% or greater of total operating time OR total CMS downtime is greater than 5% for reporting period, include:
      - (i) 15-minute data and daily averages for all operating days out of the range;
      - (ii) duration of excursions; and

- (iii) operating logs and scenarios for all operating days out of range;
  - (C) Summary reports of excess emissions, parameter exceedances, and monitor downtime including information specified in 40 CFR 63.10(c)(5) through (c)(13);
  - (D) Report, when applicable, no excess emissions, no exceedances, no excursions, and no CMS has been inoperative, out of control, repaired or adjusted;
  - (E) For CVS bypass lines with flow indicator: report all periods when vent stream is diverted from control device through bypass line;
  - (F) For CVS bypass lines without flow indicator: report periods in which seal mechanism is broken, position has changed or key to unlock bypass line valve was checked out;
  - (G) Report each new operating scenario that has been operated since last report; and
  - (H) SSM summary reports for the RTO control system, including associated CEMS and CMS equipment.
- (2) In addition to the requirements described in (b)(1) of this condition, the Permittee shall report the following information for the CO, NO<sub>x</sub> and SO<sub>2</sub> CEMS to satisfy the PSD BACT requirements [326 IAC 2-1.1-11]:
- (A) A list of days when Condition D.11.8 requires that CEMS data must be supplemented.
  - (B) A detailed report for each day when Condition D.11.8 requires that CEMS data must be supplemented that provides:
    - (i) the information required by Condition D.11.4(a)(3) and D.11.4(b)(3), and
    - (ii) an analysis of whether that information indicates continuous compliance with the limits established in Condition D.11.1, and if the NO<sub>x</sub> CEMS malfunctions for greater than six continuous hours, an assessment of NO<sub>x</sub> emissions, using process knowledge to determine whether the quantity of nitrogen fed into the RTO during that time could have exceeded the worst case 24-hour daily average nitrogen feed rate of 1,085 pounds per hour that formed the basis of the NO<sub>x</sub> BACT limit.
- (c) Immediate Reporting Requirements

The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the reporting requirements under the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].

- (1) The Permittee shall report all actions taken during an RTO system SSM event that results in an exceedance of a relevant emission standard when those actions are inconsistent with the procedures specified in the SSM Plan. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.

- (2) Within 7 working days after the end of an SSM event of the RTO control system and associated CEMS and CMS equipment where an action taken by the Permittee is not consistent with the procedures specified in the SSM Plan, the Permittee shall submit a letter containing the following information in accordance with 40 CFR 63.10(d)(5):
- (A) Name, title and signature of responsible official certifying accuracy;
  - (B) Explanation of the circumstances of the event;
  - (C) Reason for not following the SSM Plan; and
  - (D) Report any excess emissions and/or parameter monitoring exceedances that are believed to have occurred.

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

**D.11.10 Modifications and Construction: Advance Approval of Permit Conditions**

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- (a) The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.
- (b) The Permittee may construct and install new emission units comparable in function to the emission units listed in this D section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

**SECTION D.12 TO3/TO4 LIQUID WASTE INCINERATORS, INCLUDING ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT AND CONTINUOUS MONITORING SYSTEMS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the following facility description box is descriptive information and does not constitute enforceable conditions:				
Emission Unit Description	Building	Stack/Vent*	Nominal Capacity	Control Device*
TO3 Liquid Waste Incinerator	C9	PVC9TO3/4	85 MMBtu/hr	Condenser/Absorber; Hydro-Sonic™ Scrubber; Polishing Scrubber
TO4 Liquid Waste Incinerator	C9	PVC9TO3/4	85 MMBtu/hr	Condenser/Absorber; Hydro-Sonic™ Scrubber; Polishing Scrubber
*The TO3 and TO4 incinerators utilize a common air pollution control (APC) system and exhaust through the same stack.				

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

**D.12.1 General Applicability Requirements with Emission Standards [326 IAC 2-2-3 and 40 CFR Part 63, Subparts DD and EEE]**

- (a) Pursuant to the Hazardous Waste Combustor (HWC) MACT Standards [40 CFR 63.1206(b)(1)(i)] and the PSD BACT requirements [326 IAC 2-2-3], the emission standards and operating requirements shall apply as specified in Conditions D.12.2, D.12.3, D.12.4, D.12.5, D.12.6, D.12.7, and D.12.16 except during periods of startup, shutdown, and malfunction.
- (b) Pursuant to the Off-Site Waste and Recovery Operations MACT Standards [40 CFR 63.684(b)(5)(i)], the TO3/TO4 incinerators shall have a permit issued under 40 CFR Part 270 whenever off-site waste material is treated and destroyed in the incinerators.
- (c) Pursuant to the HWC MACT standards [40 CFR 63.1206(b)(5)(i), (ii) and (iii)] and the PSD requirements [326 IAC 2-2-3], the Permittee may make a change in the design, operation, or maintenance practices documented in the comprehensive performance test plan (CPT plan), Documentation of Compliance (DOC), Notification of Compliance (NOC), or startup, shutdown, and malfunction plan (SSM plan). The requirements for changes affected by HWC MACT are described in Condition F.1.13.

**D.12.2 Particulate Matter Emission Standards [40 CFR 63.1203]**

In order to satisfy the HWC MACT standards [40 CFR 63.1203(a)(7)], the particulate matter (PM) emissions from the TO3/TO4 liquid waste incinerators stack exhaust shall not exceed 34 milligrams per dry standard cubic meter (mg/dscm) [0.015 grains per dry standard cubic foot (gr/dscf)], corrected to 7 percent oxygen.

**D.12.3 Sulfur Dioxide (SO<sub>2</sub>) Emission Standards [326 IAC 2-2-3]**

In order to satisfy the PSD BACT requirements [326 IAC 2-2-3], the TO3/TO4 liquid waste incinerators shall be equipped with a caustic scrubber system to control SO<sub>2</sub> emissions. The SO<sub>2</sub> emissions from the incinerators stack exhaust, as monitored by a CEMS, shall not exceed 500 ppmv, dry corrected to 7% oxygen, averaged over a 24-hour daily period when burning waste streams. The incinerators are not subject to emission limitations and standards in 326 IAC 7 because they do not have the capability to burn fuel oil.

**D.12.4 Oxides of Nitrogen (NO<sub>x</sub>) Emission Standards [326 IAC 2-2-3]**

In order to satisfy the PSD BACT requirements [326 IAC 2-2-3], the TO3/TO4 liquid waste incinerators shall implement good combustion practices to control NO<sub>x</sub> emissions. The NO<sub>x</sub> emissions from the incinerators stack exhaust, as monitored by a continuous emissions monitor,

shall not exceed 975 ppmv (expressed as NO<sub>2</sub>), dry basis, corrected to 7% oxygen, averaged over a 24-hour daily period when burning waste streams.

**D.12.5 Hazardous Air Pollutant (HAP) and Fluoride Emission Standards [40 CFR 63.1203 and 326 IAC 2-2-3]**

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Except for periods of startup, shutdown and malfunction, the following emission standards shall apply at all times the TO3/TO4 liquid waste incinerators are operating:

- (a) Mercury – In order to satisfy the HWC MACT standards [40 CFR 63.1203(a)(2)], the mercury emissions from the TO3/TO4 liquid waste incinerators stack exhaust shall not exceed 130 micrograms per dry standard cubic meter (µg/dscm), corrected to 7% oxygen.
- (b) Lead and Cadmium – In order to satisfy the HWC MACT standards [40 CFR 63.1203(a)(3)], the total semi-volatile metals (lead and cadmium) emissions from the TO3/TO4 liquid waste incinerators stack exhaust shall not exceed 240 µg/dscm, corrected to 7% oxygen.
- (c) Arsenic, Beryllium, and Chromium – In order to satisfy the HWC MACT standards [40 CFR 63.1203(a)(4)], the total low volatile metals (arsenic, beryllium, and chromium) emissions from the TO3/TO4 liquid waste incinerators stack exhaust shall not exceed 97 µg/dscm, corrected to 7% oxygen.
- (d) Hydrochloric Acid/Chlorine Gas (HCl/Cl<sub>2</sub>) and Fluorides – In order to satisfy the HWC MACT standards [40 CFR 63.1203(a)(6)], the HCl/Cl<sub>2</sub> emissions from the TO3/TO4 liquid waste incinerators stack exhaust shall not exceed 77 ppmv, dry corrected to 7% oxygen, expressed as hydrochloric acid equivalent. In order to satisfy the PSD BACT requirements for fluorides [326 IAC 2-2-3], the TO3/TO4 liquid waste incinerators control system shall achieve a HCl control efficiency of 98% or greater, when they are operating in waste mode.
- (e) Dioxin/Furans – In order to satisfy HWC MACT standards [40 CFR 63.1203(a)(1)], the dioxin/furan emissions from the TO3/TO4 liquid waste incinerators stack exhaust shall not exceed 0.40 ng TEQ/dscm, corrected to 7% oxygen.
- (f) Principal Organic Hazardous Constituents (POHCs) – In order to satisfy the HWC MACT standards [40 CFR 63.1203(c)(1) and (2)], the Permittee shall comply with the following requirements:
  - (1) The destruction and removal efficiency (DRE) for each principal organic hazardous constituent (POHC), excluding dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027, shall be at least 99.99 percent.
  - (2) Dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027 shall not be burned in the TO3/TO4 liquid waste incinerators.

**D.12.6 Carbon Monoxide (CO) Emission Standards [326 IAC 2-2-3 and 40 CFR 63.1203]**

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In order to satisfy the HWC MACT standards [40 CFR 63.1203(a)(5)(i)] and the PSD BACT requirements [326 IAC 2-2-3], the CO emissions from the TO3/TO4 liquid waste incinerators stack exhaust shall not exceed an hourly rolling average (rolled on a one-minute basis) of 100 parts per million by volume, dry basis, corrected to 7 percent oxygen (ppmvdc) at all times the incinerators are operating except during periods of startup, shutdown, and malfunction.

**D.12.7 Hydrocarbon (HC) and Volatile Organic Compound (VOC) Emission Standards [326 IAC 2-2-3 and 40 CFR 63.1203]**

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- (a) In order to satisfy the HWC MACT standards for HC [40 CFR 63.1203(a)(5)(i)] and the PSD BACT requirements for VOC [326 IAC 2-2-3], the hourly rolling average

hydrocarbon emissions, as monitored with a CEMS during the POHC DRE test, shall not exceed 10 ppmv, dry basis, corrected to 7% oxygen, and reported as propane.

- (b) During the POHC DRE test, the CO emissions shall not exceed an hourly rolling average of 100 ppmv, dry basis, corrected to 7% oxygen (monitored with a continuous emissions monitoring system).

#### D.12.8 Automatic Waste Feed Cutoff System Requirements [40 CFR 63.1206]

In order to satisfy the HWC MACT standards [40 CFR 63.1206], the Permittee shall operate the TO3/TO4 liquid waste incinerators with a functioning Automatic Waste Feed Cutoff (AWFCO) system that meets the requirements of 40 CFR 63.1206(c)(3).

- (a) Except as allowed under (c) and (f) of this condition, the AWFCO system shall be operated such that it immediately and automatically cuts off the hazardous waste feed when any of the following occur at any time:
  - (1) An operating parameter is exceeded;
  - (2) The CO emission standard is exceeded;
  - (3) A span value of any CMS, except a CEMS, is met or exceeded;
  - (4) Upon malfunction of a CMS (excluding the NO<sub>x</sub> and SO<sub>2</sub> CEMS) monitoring an operating parameter limit or emission level; or
  - (5) When any component of the automatic waste feed cutoff system fails.
- (b) During all AWFCO events, the Permittee shall continue to:
  - (1) Duct combustion gases to the air pollution control system while hazardous waste remains in the combustion chamber; and
  - (2) Monitor the applicable combustor operating parameters and emission levels.
- (c) The Permittee may ramp down the hazardous waste feed rate of pumpable hazardous waste over a period not to exceed one (1) minute during an AWFCO event in accordance with the procedures in the O&M plan, providing the automatic waste feed cutoff is not triggered by an exceedance of any of the following operating limits:
  - (1) Minimum combustion chamber temperature,
  - (2) Maximum hazardous waste feed rate, or
  - (3) Any hazardous waste combustor firing system operating limits.

The procedures for AWFCO events specified in the O&M plan must include a statement that the ramp down must begin immediately upon initiation of automatic waste feed cutoff and must prescribe a bona fide ramping down.

- (d) Except as allowed under (f) of this condition, after an AWFCO event, the Permittee shall not restart the hazardous waste feed until the operating parameters and emission levels are within their respective limits.
- (e) If after any AWFCO event, there is an exceedance of an emission standard or operating requirement, irrespective of whether the exceedance occurred while hazardous waste remained in the combustion chamber, the Permittee shall:
  - (1) Investigate the cause of the AWFCO, and

- (2) Take appropriate corrective measures to minimize future AWFCOs.
- (f) The following exceptions are allowed for the operation of the AWFCO system as specified in Condition D.12.8(a):
  - (1) If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), the Permittee may exceed the operating parameter limit for primary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the secondary waste feed.
  - (2) If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), the Permittee may exceed the operating parameter limit for secondary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the primary waste feed.

D.12.9 Leak Detection and Repair (LDAR) Program [326 IAC 2-2-3, 40 CFR Part 63, Subpart DD, 40 CFR Part 61, Subpart V]

The LDAR standards that apply to components associated with the waste transfer/feed systems connected to the TO3/TO4 liquid waste incinerators are described in Section E.2 of this permit.

D.12.10 Inspection Requirements [40 CFR 63.1206(c)]

- (a) In order to satisfy the HWC MACT standards [40 CFR 63.1206(c)(5)], the Permittee shall conduct daily visual inspections of the TO3/TO4 liquid waste incinerators to ensure the combustion zone is sealed.
- (b) In order to satisfy the HWC MACT standards [40 CFR 63.1206(c)(3)(vii)], the Permittee shall test the AWFCO system and associated alarms at least once per week to verify operability, unless the operating record documents that the weekly inspections unduly restrict or upset operations and that less frequent inspection will be adequate. At a minimum, the Permittee shall conduct operability testing monthly.

D.12.11 Training and Certification Requirements [40 CFR 63.1206(c)(6)]

- (a) In order to satisfy the HWC MACT standards [40 CFR 63.1206(c)(6)], the Permittee shall establish a Training and Certification Program for all categories of personnel whose activities may reasonably be expected to directly affect emissions of HAPs from all operations associated with the TO3/TO4 liquid waste incinerators.

Said programs shall be of a technical level commensurate with the person's duties as specified in the training manual.

- (b) A certified control room operator shall be on duty at the site at all times the TO3/TO4 liquid waste incinerators are in operation and the TO3/TO4 liquid waste incinerators, including associated air pollution control equipment and continuous monitoring systems, shall be operated and maintained at all times by persons who are trained and certified according to the Training and Certification Program.

D.12.12 Plans and Procedures [326 IAC 2-2-3, 40 CFR 63.1206, 40 CFR 63.1211, 326 IAC 2-7-5(13)]

In order to satisfy the HWC MACT Standards [40 CFR 63.1206] and the PSD BACT requirements [326 IAC 2-2-3], the Permittee shall develop and implement the following written plans:

- (a) Operations and Maintenance (O&M) Plan – The O&M Plan shall define operations during periods of normal operation pursuant to 40 CFR 63.1206(c)(1) and (7).
- (b) Startup, Shutdown, and Malfunction (SSM) Plan – The SSM Plan shall be developed and implemented in accordance with 40 CFR 63.1206(c)(2), 40 CFR 63.6(e)(3), and 40 CFR 63.8(c), to ensure that the TO3/TO4 liquid waste incinerators, including associated air

emission control equipment and CEMS and CMS, are operated and maintained in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i), and that all malfunctions are corrected as soon as practicable after their occurrence in order to minimize excess emissions. The SSM Plan shall contain the following information:

- (1) Detailed procedures for operating and maintaining the TO3/TO4 incinerators, including associated CEMS and CMS equipment, during periods of startup, shutdown, and malfunction; and
  - (2) Corrective action program for malfunctioning process, air pollution control, CEMS, and CMS equipment.
- (c) Feedstream Analysis Plan -The Feedstream Analysis Plan shall be developed and implemented in accordance with 40 CFR 63.1209(c)(2) for those parameters with feed rate limits defined in Condition D.12.16.
- (d) Continuous Emissions Monitoring System (CEMS) Standard Operating Procedures (SOP) – The Permittee shall prepare and implement a SOP that provides step-by-step procedures and operations of the CEMS in accordance with 326 IAC 3-5-4(a), and that includes preventive maintenance procedures and corrective maintenance procedures that will be taken to ensure continuous operation and to minimize malfunctions.

### **Simultaneous Operation of TO3/TO4 Liquid Waste Incinerators**

#### **D.12.13 Restriction on Simultaneous Operation of TO3/TO4 Liquid Waste Incinerators**

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The Permittee shall not operate both the TO3 and TO4 liquid waste incinerators at the same time, in either waste or idle mode.

### **Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.12.14 Performance Test Requirements [40 CFR 63.1207, 326 IAC 2-1.1-11, 326 IAC 3-6]**

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The following streamlined performance test requirements shall satisfy the NESHAP General Provisions [40 CFR 63.7], the HWC MACT requirements [40 CFR 63.1207 and 63.1209], the PSD BACT requirements for VOC and fluorides [326 IAC 2-1.1-11], and the State emission testing requirements [326 IAC 3-6]:

- (a) Initial Comprehensive Performance Test Requirements:
- (1) Unless the Permittee requests U.S. EPA Region 5 to waive the initial comprehensive performance test and its request is granted, comprehensive performance tests will be performed on both TO3 and TO4 liquid waste incinerators.
  - (2) The Permittee shall commence initial comprehensive performance tests within 6 months of the compliance date for the TO3 and TO4 liquid waste incinerators, unless an extension is granted pursuant to 40 CFR 63.1207(e)(3) or if U.S. EPA Region 5 grants Permittee's request to waive the initial comprehensive performance test.
  - (3) If the U.S. EPA Region 5 does not approve the Permittee's request to waive the initial comprehensive performance test, and instead requires the Permittee to perform additional performance testing, the Permittee shall submit the required notification(s) within an acceptable schedule, upon final determination of Permittee's request by U.S. EPA Region 5.
  - (4) The Permittee shall submit a notification of the performance test and CMS performance evaluation and submit a comprehensive performance test plan at

least one (1) year in advance of the intended performance test date(s) for the TO3 and TO4 liquid waste incinerators.

- (5) The initial comprehensive performance test(s) shall be conducted under operating conditions representative of the extreme range of normal conditions as specified in 40 CFR 63.6(f)(2)(iii)(B) and 63.7(e)(1) for the worst case mode associated with each applicable pollutant limit or emission standard.
- (6) The operating parameters defined in Condition D.12.16 shall be monitored during the performance test(s) to establish the parametric limits.
- (7) All required comprehensive performance testing shall be completed within 60 days after the date of commencement of the test(s) pursuant to 40 CFR 63.1207(d)(3).
- (8) The Permittee may use previous emissions test data in lieu of the initial comprehensive performance test as allowed under 40 CFR 63.1207(c)(2).
- (9) Pursuant to 40 CFR 63.7(h)(2), individual performance tests may be waived upon written application to the Administrator if, in the Administrator's judgment, the source is meeting the relevant standard(s) on a continuous basis, or the source is being operated under an extension of compliance, or the owner or operator has requested an extension of compliance and the Administrator is still considering the request.
- (10) Pursuant to 40 CFR 63.1207(j), the Permittee shall:
  - (A) Postmark a Notification of Compliance (NOC) documenting compliance or noncompliance with the emission standards and continuous monitoring system requirements and identify operating parameter limits under 40 CFR 63.1209 within 90 days of completion of the comprehensive performance test(s); and
  - (B) Comply with all operating requirements specified in the NOC in lieu of the limits specified in the Documentation of Compliance required under 40 CFR 63.1211(c) upon postmark of the NOC.

The Permittee may choose to comply with the operating requirements for the TO3 and TO4 liquid waste incinerator based on the results of the unit-specific initial comprehensive performance tests. Alternatively, the Permittee may choose to comply with the more stringent of the operating requirements for both incinerators based on the results of the initial comprehensive performance test for TO3 and TO4 liquid waste incinerators.

These submittal requirements satisfy the reporting requirements of 326 IAC 3-6 as allowed under extension provisions of 326 IAC 3-6-4(b).

- (11) Pursuant to 40 CFR 63.1207(l), if the Permittee determines that it has exceeded an emission standard during the initial comprehensive performance test for a particular mode of operation:
  - (A) It must immediately cease burning hazardous waste under that mode of operation.
  - (B) Hazardous waste may only be burned for the purpose of pre-testing or comprehensive performance testing under revised operating conditions, and only for a maximum of 720 hours, unless the Permittee obtains

written approval for a petition submitted in accordance with 40 CFR 63.1207(l)(3).

- (C) It must conduct a comprehensive performance test under revised operating conditions and submit a Notification of Compliance within 90 days of completion of comprehensive performance test.

These submittal requirements satisfy the reporting requirements of 326 IAC 3-6 as allowed under extension provisions of 326 IAC 3-6-4(b).

- (D) Comply with all operating requirements specified in the NOC in lieu of the limits specified in the revised operating conditions that were established for pre-testing or comprehensive performance testing, upon postmark of the NOC.

(b) Subsequent Comprehensive Performance Tests

- (1) Pursuant to 40 CFR 63.1207(d)(4)(i), no subsequent comprehensive performance tests (including DRE tests) shall be required until the U.S. EPA promulgates permanent replacement standards pursuant to the Settlement Agreement noticed in the Federal Register on November 16, 2001, unless the Permittee modifies or otherwise alters operations such that compliance with the emission standards of Conditions D.12.2, D.12.5, and D.12.7 cannot be achieved.
- (2) Upon promulgation of the permanent replacement standards, the Permittee shall comply with the subsequent comprehensive testing requirements established.

(c) Confirmatory Performance Tests

- (1) Pursuant to 40 CFR 63.1207(d)(4)(ii), no confirmatory performance tests shall be required until the U.S. EPA promulgates permanent replacement standards pursuant to the Settlement Agreement noticed in the Federal Register on November 16, 2001.
- (2) Upon promulgation of the permanent replacement standards, the Permittee shall comply with the subsequent confirmatory testing requirements established.

D.12.15 Continuous Emissions Monitoring Systems (CEMS) Operating Requirements [40 CFR 63.1209, 40 CFR 63.8, 326 IAC 3-5, 326 IAC 2-1.1-11, 40 CFR Part 60, Appendix B, and 40 CFR Part 60, Appendix F]

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- (a) CO and O<sub>2</sub> CEMS Operation Requirements – The following requirements shall be applied at all times the TO3/TO4 incinerators are in operation and represent the streamlined requirements of the HWC MACT standards for CO and HC [40 CFR 63.1209(a), (d), (e), (f), and (h)], PSD BACT requirements for CO and VOCs [326 IAC 2-1.1-11], and the emission monitoring requirements for MACT and PSD sources [326 IAC 3-5-1(b) and (d)]:

- (1) The Permittee shall install and operate the CO and O<sub>2</sub> CEMS in accordance with the QA requirements of the HWC MACT standards [40 CFR Part 63, Appendix to Subpart EEE], the applicable QC and performance evaluation requirements of 40 CFR 63.1209(d), and the applicable performance specification requirements of 40 CFR Part 60, Appendix B.
- (2) The CEMS shall be installed and operational upon certification of the DOC for the HWC MACT.

- (3) Continuous operation of a CEMS is defined as sampling the regulated parameter without interruption, evaluating the detector response at least once every 15 seconds, and computing and recording the average value at least every 60 seconds.
- (b) SO<sub>2</sub> and NO<sub>x</sub> CEMS Operation Requirements – The following requirements shall apply when the TO3/TO4 incinerators are burning waste and represent the PSD BACT requirements for SO<sub>2</sub> and NO<sub>x</sub> [326 IAC 2-1.1-11] and the emission monitoring requirements for PSD sources [326 IAC 3-5-1(d)]:
- (1) The Permittee shall install and operate the SO<sub>2</sub> and NO<sub>x</sub> CEMS in accordance with the QA/QC criteria set forth in 40 CFR Part 60, Appendix B and 40 CFR Part 60, Appendix F, Procedure 1.
  - (2) Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.
  - (3) The Startup, Shutdown, and Malfunction (SSM) Plan required by Condition D.12.12(b) shall include procedures for monitoring and recording the following information during times of SO<sub>2</sub> or NO<sub>x</sub> CEMS malfunction:
    - (A) When the SO<sub>2</sub> CEMS malfunctions, the Permittee shall monitor and record the equivalent differential pressure across the Hydro-Sonic™ scrubber, polishing scrubber pressure drop, scrubber liquid to gas ratios, polishing scrubber liquid pH, and the condenser/absorber liquid pH as required by Condition D.12.16(a)(3)(C), Condition D.12.16(a)(5)(E), Condition D.12.16(a)(3)(D), Condition D.12.16(a)(5)(C), and Condition D.12.16(a)(5)(F), respectively.
    - (B) When the NO<sub>x</sub> CEMS malfunctions, the Permittee shall monitor and record the combustion chamber temperature, flue gas flow rate, and primary and secondary waste feed rates as required by Condition D.12.16(a)(1), and if the NO<sub>x</sub> CEMS malfunctions for greater than six continuous hours, assess the NO<sub>x</sub> emissions, using waste testing, waste shipment, and/or process knowledge to determine whether the quantity of nitrogen fed into the incinerator during that time could have exceeded the worst case 24-hour daily average nitrogen feed rate of 1,650 pounds per hour that formed the basis of the NO<sub>x</sub> BACT limit.

D.12.16 Parametric Continuous Monitoring Systems (CMS) Requirements [40 CFR 63.8(c), 40 CFR 63.1209, and 326 IAC 2-1.1-11]

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- (a) Except as stated in Conditions D.12.16(a)(1)(C), D.12.16(a)(1)(D) and D.12.16(a)(2)(B), the Permittee shall operate the following CMSs in accordance with the quality assurance requirements specified in 40 CFR 63.1209(d) at all times the TO3/TO4 incinerators are in operation. To satisfy the HWC MACT standards [40 CFR 63.1209(b), (d), (e), (f), and (h)] and the requirements for PSD sources [326 IAC 2-1.1-11] the following parameters, except as stated in Conditions D.12.16(a)(1)(C), D.12.16(a)(1)(D) and D.12.16(a)(2)(B), shall be monitored at all times the TO3/TO4 incinerators are in operation. In addition, except as stated in Conditions D.12.16(e), (f), and (g), the operating parameters monitored by the following CMSs shall not exceed the established operating parameter limits at all times incinerators are burning waste.
  - (1) Dioxin/Furan CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(k)], the Permittee shall install and operate CMS monitors for the following parameters:

- (A) Combustion Chamber Temperature - Minimum hourly rolling average combustion chamber temperature established from the average temperature measured during the three DRE test runs.
- (i) For TO3 liquid waste incinerator, the hourly rolling average combustion chamber temperature shall not be lower than 1,906 °F.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average combustion chamber temperature shall not be lower than 1,957 °F.
- (B) Flue Gas Flow Rate - Maximum hourly rolling average flue gas flow rate established from the average of the maximum hourly rolling average for each performance test run.
- (i) For TO3 liquid waste incinerator, the hourly rolling average flue gas flow rate shall not exceed 16,046 standard cubic feet per minute, on a wet basis.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average flue gas flow rate shall not exceed 15,996 standard cubic feet per minute, on a wet basis.
- (C) Primary Waste Feed Rate - Maximum hourly rolling average primary waste feed rate as established from the average of the maximum hourly rolling average for each performance test run.
- If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), operation of the primary waste feed rate CMS is not required and the Permittee may use a value of 0 lb/hr for primary waste feed rate, or the Permittee may continue to use the valid primary waste feed rate values being monitored and recorded by the primary waste feed rate CMS, for calculating the hourly and 12-hour rolling average values for relevant operating parameters.
- (i) For TO3 liquid waste incinerator, the hourly rolling average primary waste feed rate shall not exceed 6,030 pounds per hour.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average primary waste feed rate shall not exceed 5,975 pounds per hour.
- (D) Secondary Waste Feed Rate - Maximum hourly rolling average secondary waste feed rate as established from the average of the maximum hourly rolling average for each performance test run.
- If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), operation of the secondary waste feed rate CMS is not required and the Permittee may use a value of 0 lb/hr for secondary waste feed rate, or the Permittee may continue to use the valid secondary waste feed rate values being monitored and recorded by the secondary waste feed rate CMS, for calculating the hourly and 12-hour rolling average values for relevant operating parameters.
- (i) For TO3 liquid waste incinerator, the hourly rolling average secondary waste feed rate shall not exceed 17,001 pounds per hour.

- (ii) For TO4 liquid waste incinerator, the hourly rolling average secondary waste feed rate shall not exceed 16,597 pounds per hour.

- (2) DRE Standard CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(j)], the Permittee shall install and operate CMS monitors for the following parameters:

- (A) Those parameters identified in Condition D.12.16(a)(1).
- (B) Minimum hourly rolling average primary and secondary atomizing media pressure, established based on manufacturer's recommendations.

If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), operation of the primary waste atomizing media pressure CMS is not required and the Permittee may freeze the hourly rolling average calculation when primary waste is not being burned, or the Permittee may continue to use the valid primary waste atomizing media pressure values being monitored and recorded by the primary waste atomizing media pressure CMS, for calculating the hourly rolling average values.

If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), operation of the secondary waste atomizing media pressure CMS is not required and the Permittee may freeze the hourly rolling average calculation when secondary waste is not being burned, or the Permittee may continue to use the valid secondary waste atomizing media pressure values being monitored and recorded by the secondary waste atomizing media pressure CMS, for calculating the hourly rolling average values.

- (i) For TO3 liquid waste incinerator, the hourly rolling average primary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.
- (ii) For TO3 liquid waste incinerator, the hourly rolling average secondary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.
- (iii) For TO4 liquid waste incinerator, the hourly rolling average primary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.
- (iv) For TO4 liquid waste incinerator, the hourly rolling average secondary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.

In addition, the Permittee shall establish limits on the following parameters. These data collection activities do not require continuous monitoring systems.

- (C) Maximum primary waste feed viscosity, established based on manufacturer's recommendations. The primary waste feed viscosity shall be monitored through periodic analysis of the primary waste feed, as specified in the Permittee's Feedstream Analysis Plan.
  - (i) For TO3 liquid waste incinerator, the primary waste feed viscosity shall not exceed 460 centipoise.

- (ii) For TO4 liquid waste incinerator, the primary waste feed viscosity shall not exceed 460 centipoise.
  - (D) Maximum secondary waste feed viscosity, established based on manufacturer's recommendations. The secondary waste feed viscosity shall be monitored through periodic analysis of the secondary waste feed, as specified in the Permittee's Feedstream Analysis Plan.
    - (i) For TO3 liquid waste incinerator, the secondary waste feed viscosity shall not exceed 460 centipoise.
    - (ii) For TO4 liquid waste incinerator, the secondary waste feed viscosity shall not exceed 460 centipoise.
- (3) Metals CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(l) and (n)], the Permittee shall install and operate CMS monitors for the following parameters:
  - (A) Waste Feed Rate - Maximum 12-hour rolling average feed rates for total Hg, semi-volatile metals (cadmium and lead) and low volatile metals (arsenic, beryllium, and chromium) in all waste feedstreams established from the average of the hourly rolling averages for each performance test run and approved extrapolation techniques:
    - (i) For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for total Hg shall not exceed 0.0040 pounds per hour.
    - (ii) For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for semi-volatile metals (cadmium and lead) shall not exceed 0.10 pounds per hour.
    - (iii) For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for low volatile metals (arsenic, beryllium, and chromium) shall not exceed 0.30 pounds per hour.
    - (iv) For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for total Hg shall not exceed 0.0040 pounds per hour.
    - (v) For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for semi-volatile metals (cadmium and lead) shall not exceed 0.22 pounds per hour.
    - (vi) For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for low volatile metals (arsenic, beryllium, and chromium) shall not exceed 0.30 pounds per hour.
  - (B) Scrubber Liquids Solid Content -
    - (i) Condenser/Absorber - Maximum 12-hour rolling average density of the condenser/absorber sump liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.
      - (a) For TO3 liquid waste incinerator, the 12-hour rolling average density of the condenser/absorber sump liquid shall not exceed 8.367 pounds per gallon.

- (b) For TO4 liquid waste incinerator, the 12-hour rolling average density of the condenser/absorber sump liquid shall not exceed 8.401 pounds per gallon.
- (ii) Hydro-Sonic™ Scrubber 1st Stage - Maximum 12-hour rolling average density of the demister sump liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.
- (a) For TO3 liquid waste incinerator, the 12-hour rolling average density of the demister sump liquid shall not exceed 8.361 pounds per gallon.
- (b) For TO4 liquid waste incinerator, the 12-hour rolling average density of the demister sump liquid shall not exceed 8.363 pounds per gallon.
- (iii) Polishing Scrubber - Maximum 12-hour rolling average density of the polishing scrubber liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.
- (a) For TO3 liquid waste incinerator, the 12-hour rolling average density of the polishing scrubber liquid shall not exceed 8.494 pounds per gallon.
- (b) For TO4 liquid waste incinerator, the 12-hour rolling average density of the polishing scrubber liquid shall not exceed 8.511 pounds per gallon.
- (C) Hydro-Sonic™ Scrubber Pressure Drop - Minimum hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber established from the average of the performance test run averages and based on the following equation:
- $$\text{Equivalent dP} = (\text{Measured dP}) + [(3 \times 10^{-11}) \times (\text{Steam Rate})^3] - [(4 \times 10^{-7}) \times (\text{Steam Rate})^2] + 0.0026 \times (\text{Steam Rate})$$
- The Permittee may develop a site-specific model to calculate the equivalent differential pressure. The site-specific model should be submitted to the U.S. EPA Region 5 for approval. The site-specific model can be used for demonstrating compliance with the operating parameter limit on equivalent differential pressure only after approval by U.S. EPA Region 5.
- (i) For TO3 liquid waste incinerator, the hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber shall not be lower than 68 inches of water column.
- (ii) For TO4 liquid waste incinerator, the hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber shall not be lower than 68 inches of water column.
- (D) Scrubber Liquid to Gas Ratio -
- (i) Hydro-Sonic™ Scrubber 1<sup>st</sup> Stage – Minimum hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage

free jet nozzle established from the average of the performance test run averages.

- (a) For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage free jet nozzle shall not be lower than 0.00999 (gallons per minute) per (standard cubic feet per minute), wet basis.
  - (b) For TO4 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage free jet nozzle shall not be lower than 0.01038 (gallons per minute) per (standard cubic feet per minute), wet basis.
- (ii) Hydro-Sonic™ Scrubber 2<sup>nd</sup> Stage – Minimum hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle established from the average of the performance test run averages.
- (a) For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle shall not be lower than 0.00593 (gallons per minute) per (standard cubic feet per minute), wet basis.
  - (b) For TO4 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle shall not be lower than 0.00614 (gallons per minute) per (standard cubic feet per minute), wet basis.
- (E) Those parameters identified in Condition D.12.16(a)(1)(B).
- (4) PM CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(m)], the Permittee shall install and operate CMS monitors for the following parameters:
- (A) Those parameters identified in Condition D.12.16(a)(3)(B), (C), (D), and (E); and
  - (B) Ash Feed Rate - Maximum 12-hour rolling average ash feed rate established from the average of the test run averages.
    - (i) For TO3 liquid waste incinerator, the 12-hour rolling average ash feed rate shall not exceed 1,861 pounds per hour.
    - (ii) For TO4 liquid waste incinerator, the 12-hour rolling average ash feed rate shall not exceed 1,628 pounds per hour.
- (5) HCl/Cl<sub>2</sub> and Fluorides CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(o)] and monitoring requirements for PSD sources [326 IAC 2-1.1-11], the Permittee shall install and operate CMS monitors for the following parameters:
- (A) Those parameters identified in Condition D.12.16(a)(3)(C) and (D);

- (B) Waste Feed Rate - Maximum 12-hour rolling average feed rate for chlorine (organic and inorganic) in all waste feedstreams established from the average of the performance test run averages. [40 CFR 63.1209(o)(1)]
  - (i) For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for chlorine shall not exceed 2,632 pounds per hour.
  - (ii) For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for chlorine shall not exceed 2,771 pounds per hour.
  
- (C) Polishing Scrubber Liquid pH - Minimum hourly rolling average polishing scrubber liquid pH established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]
  - (i) For TO3 liquid waste incinerator, the hourly rolling average polishing scrubber liquid pH shall not be lower than 4.6.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average polishing scrubber liquid pH shall not be lower than 4.4.
  
- (D) Polishing Scrubber Liquid Feed Pressure – Minimum hourly rolling average polishing scrubber liquid feed pressure established from manufacturer’s specifications.
  - (i) For TO3 liquid waste incinerator, the hourly rolling average polishing scrubber liquid feed pressure shall not be lower than 6.8 pounds per square inch, gauge.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average polishing scrubber liquid feed pressure shall not be lower than 6.8 pounds per square inch, gauge.
  
- (E) Polishing Scrubber Pressure Drop – Minimum hourly rolling average pressure drop across the polishing scrubber established from manufacturer’s specifications. [40 CFR 63.1209(o)(3)(ii)]
  - (i) For TO3 liquid waste incinerator, the hourly rolling average pressure drop across the polishing scrubber shall not be lower than 2.3 inches of water column.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average pressure drop across the polishing scrubber shall not be lower than 2.3 inches of water column.
  
- (F) Condenser/Absorber Liquid pH – Minimum hourly rolling average condenser/absorber liquid pH established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]
  - (i) For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid pH shall not be lower than 4.1.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average condenser/absorber liquid pH shall not be lower than 4.6.
  
- (G) Condenser/Absorber Liquid Feed Pressure – Minimum hourly rolling average condenser/absorber liquid feed pressure established from manufacturer’s specifications. [40 CFR 63.1209(o)(3)(iii)]

- (i) For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid feed pressure shall not be lower than 8 pounds per square inch, gauge.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average condenser/absorber liquid feed pressure shall not be lower than 8 pounds per square inch, gauge.
- (H) Condenser/Absorber Pressure Drop – Minimum hourly rolling average pressure drop across the condenser/absorber established from manufacturer's specifications. [40 CFR 63.1209(o)(3)(ii)]
  - (i) For TO3 liquid waste incinerator, the hourly rolling average pressure drop across the condenser/absorber shall not be lower than 2.3 inches of water column.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average pressure drop across the condenser/absorber shall not be lower than 2.3 inches of water column.
- (I) Pursuant to 40 CFR 63.1209(o)(3)(v) and a letter from U.S. EPA on September 13, 2004, Condenser/Absorber Liquid to Gas Ratio – Minimum hourly rolling average condenser/absorber liquid to gas ratio established from manufacturer's specifications for liquid flow rate and the average of the performance test run averages for flue gas flow rate. [40 CFR 63.1209(o)(3)(v)]
  - (i) For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid to gas ratio shall not be lower than 0.0561 (gallons per minute) per (standard cubic feet per minute), wet basis.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average condenser/absorber liquid to gas ratio shall not be lower than 0.0566 (gallons per minute) per (standard cubic feet per minute), wet basis.
- (J) Polishing Scrubber Liquid to Gas Ratio – Minimum hourly rolling average polishing scrubber liquid to gas ratio established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(v)]
  - (i) For TO3 liquid waste incinerator, the hourly rolling average polishing scrubber liquid to gas ratio shall not be lower than 0.0124 (gallons per minute) per (standard cubic feet per minute), wet basis.
  - (ii) For TO4 liquid waste incinerator, the hourly rolling average polishing scrubber liquid to gas ratio shall not be lower than 0.0136 (gallons per minute) per (standard cubic feet per minute), wet basis.
- (K) Hydro-Sonic™ Scrubber Liquid pH - Minimum hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]
  - (i) For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle shall not be lower than 5.8.

- (ii) For TO4 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle shall not be lower than 5.8.
- (b) Continuous operation of a CMS is defined as sampling the regulated parameter without interruption, evaluating the detector response at least once every 15 seconds, and computing and recording the average value at least every 60 seconds.
- (c) Pursuant to the HWC MACT standards [40 CFR 63.1209(a)(5)] and the monitoring methods for PSD sources [326 IAC 2-1.1-11], the Permittee may petition the Administrator to use CEMS for monitoring in lieu of compliance with the operating parameter limits established in (a) of this condition.
- (d) If applicable, the Permittee may document compliance using the waiver provisions of 40 CFR 63.1207(m) in lieu of complying with the requirements of (a) and (c) of this condition.
- (e) Pursuant to 40 CFR 63.1207(h), the operating parameter limits specified in Condition D.12.16(a) are waived during subsequent comprehensive performance tests.
- (f) Pursuant to 40 CFR 63.1207(h), the operating parameter limits specified in Condition D.12.16(a) are waived during pre-testing prior to comprehensive performance testing for an aggregate time not to exceed 720 hours (unless an extension is approved by IDEM) under an approved test plan or if the source records the results of the pre-testing.
- (g) If the Permittee submits a new Notification of Compliance based on the results of a subsequent comprehensive performance test, pursuant to 40 CFR 63.1210(b), the operating parameter limits specified in the new Notification of Compliance supersede the operating parameter limits in Condition D.12.16(a) until the operating permit is revised to incorporate the new operating parameter limits.

#### D.12.17 Minimum Data Requirements – SO<sub>2</sub> and NO<sub>x</sub> CEMS [326 IAC 2-1.1-11]

The following defines when CEMS data must be supplemented with data required by Conditions D.12.15(b)(3), D.12.18(a)(12), and D.12.19(a)(2):

- (a) When the period of incinerator operation (i.e., receiving waste streams) is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a valid hour of data for at least 75 % of the operating hours, or
- (b) When the period of incinerator operation (i.e., receiving waste streams) is less than 4 hours in an operating day and more than one of the hours during the period of operation does not constitute a valid hour of data due to insufficient monitoring data.
- (c) Monitoring data are insufficient to constitute a valid hour of data if measured values are unavailable for any of the required 15-minute periods within the hour.

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

#### D.12.18 Record Keeping Requirements

- (a) The Permittee shall maintain the following records:
  - (1) Notifications, reports, and other documents, such as the Documentation of Compliance, as required by 40 CFR 63.1200, 63.1211(c), and 63.10(b) and (c);

- (2) All data recorded by continuous monitoring systems (CMS), including continuous emission monitoring systems (CEMS), required by Conditions D.12.15 and D.12.16;
  - (3) Documentation that a change will not adversely affect compliance with the emission standards or operating requirements as required by 40 CFR 63.1206(b)(5)(ii);
  - (4) Records of the estimated hazardous waste residence time as required by 40 CFR 63.1206(b)(11);
  - (5) Plans and procedures as required by Condition D.12.12;
  - (6) Documentation of the results of the investigation, corrective measures taken, and evaluation of excessive exceedances during malfunctions as required by 40 CFR 63.1206(c)(2)(v)(A);
  - (7) Findings and corrective measures for any AWFCO that results in an exceedance of an applicable emission standard or operating parameter limit as required by 40 CFR 63.1206(c)(3)(v);
  - (8) Documentation and results of the AWFCO operability testing as required by Condition D.12.10(b) and 40 CFR 63.1206(c)(3)(vii);
  - (9) Daily visual inspection records of the TO3/TO4 liquid waste incinerators to ensure the combustion zone is sealed as required by Condition D.12.10(a) and 40 CFR 63.1206(c)(5);
  - (10) A copy of the Operator Certification and Training Program required in Condition D.12.11 and 40 CFR 63.1206(c)(6);
  - (11) Documentation of the changes in modes of operation as required by 40 CFR 63.1209(q); and
  - (12) For days when Condition D.12.17 requires that CEMS data must be supplemented, documentation of the information required by Condition D.12.15(b)(3).
- (b) The record keeping and reporting requirements for the LDAR standards are described in Section E.2 of this permit.

#### D.12.19 Reporting Requirements

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- (a) Quarterly Reporting Requirements
- (1) The following streamlined quarterly reporting requirements shall satisfy the HWC MACT standards [40 CFR 63.1211], which references the MACT General Provisions [40 CFR 63.7 through 63.10], PSD BACT requirements [326 IAC 2-1.1-11], and the continuous emissions monitoring requirements [326 IAC 3-5]:
    - (A) Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent;
    - (B) Summary reports of excess emissions, parameter exceedances, and monitor downtime including information specified in 40 CFR 63.10(c)(5) through (c)(13);
    - (C) SSM summary reports for the TO3/TO4 waste incinerators control system, including associated CEMS and CMS equipment; and

- (D) Excessive exceedances report, if applicable, as required by 40 CFR 63.1206(c)(3)(vi).
- (2) In addition to the requirements described in (a)(1) of this condition, the Permittee shall report the following information for the SO<sub>2</sub> and NO<sub>x</sub> CEMS to satisfy the PSD BACT requirements [326 IAC 2-1.1-11]:
- (A) For days when Condition D.12.17 requires that CEMS data must be supplemented, a detailed report that provides:
    - (i) the information required by Condition D.12.15(b)(3), and
    - (ii) an analysis of whether that information indicates continuous compliance with the limits established in Condition D.12.3 and D.12.4, and if the NO<sub>x</sub> CEMS malfunctions for greater than six continuous hours, an assessment of NO<sub>x</sub> emissions, using waste testing, waste shipment, and/or process knowledge to determine whether the quantity of nitrogen fed into the incinerator during that time could have exceeded the worst case 24-hour daily average nitrogen feed rate of 1,650 pounds per hour that formed the basis of the NO<sub>x</sub> BACT limit.
- (b) Immediate Reporting Requirements
- (1) The Permittee shall submit any revision to the SSM Plan that may significantly increase emissions of hazardous air pollutants to the Administrator for approval within 5 days after making a change to the plan to satisfy the reporting requirements under the HWC MACT standards [40 CFR 63.1206(c)(2)(ii)(C)].
  - (2) The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the reporting requirements under the HWC MACT standards [40 CFR 63.1206(c)(2)] and PSD BACT requirements [326 IAC 2-1.1-11].
    - (A) The Permittee shall report all actions taken during a TO3/TO4 incinerator system SSM event that results in an exceedance of a relevant emission standard when those actions are inconsistent with the procedures specified in the SSM Plan. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.
    - (B) Within 7 working days after the end of an SSM event where an action taken by the Permittee is not consistent with the procedures specified in the SSM Plan, the Permittee shall submit a letter containing the following information in accordance with 40 CFR 63.10(d)(5):
      - (i) Name, title and signature of responsible official certifying accuracy;
      - (ii) Explanation of the circumstances of the event;
      - (iii) Reason for not following the SSM Plan; and
      - (iv) Report any excess emissions and/or parameter monitoring exceedances that are believed to have occurred.

## **Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

### **D.12.20 Modifications and Construction: Advance Approval of Permit Conditions**

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- (a) The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.
  
- (b) The Permittee may construct and install new emission units of the types described in this D section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

**SECTION D.13 SOLID WASTE INCINERATOR OPERATING CONDITIONS**

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

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section. The Bartlett-Snow solid waste incinerator was permanently shut down on August 30, 2005, and is designated for demolition.						
Bldg.	Unit ID	Unit Description	Stack/Vent ID	Control Device	Capacity	Units
C10	RK01	Bartlett-Snow Solid Waste Incinerator	PVC10BS	Packed-Bed Scrubber; Hydro-Sonic™ Scrubber	3,000	lb/hr

**Emission Limitations and Standards**

D.13.1 through D.13.7 **Reserved**

**Testing and Monitoring Requirements**

D.13.8 through D.13.12 **Reserved**

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

**D.13.13 Record Keeping Requirements**

- (a) For the operation of the Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the scrubber monitoring as required by Condition D.13.9 of T165-6462-00009, issued October 1, 2004, as follows:
  - (1) The scrubber water feed rate for Stage 1 and Stage 2 and pressure drop across the hydro-sonic scrubber recorded at least once per day.
  - (2) The pH of the hydro-sonic scrubber water recorded at least once per hour.
- (b) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, as required by Condition D.13.10 of T165-6462-00009, issued October 1, 2004, the Permittee shall maintain records of the continuous monitoring of combustion chamber temperature (primary burner and afterburner), and 60-minute rolling average stack gas flow rate at least once per hour. The Permittee must also keep records of number of drums fed to the incinerator per hour, the weight of each drum, and the waste classification (hazardous or non-hazardous) for each drum.
- (c) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the visible emissions monitoring, as required by Condition D.13.11 of T165-6462-00009, issued October 1, 2004.
- (d) Beginning September 30, 2004 and until September 30, 2005, the Permittee shall maintain records of the weight of hospital, medical and infectious waste; and the total weight of wastes incinerated each calendar quarter.
- (e) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Operation and Maintenance Plan, as required by Condition D.13.1(c)(4); and Preventive Maintenance Plan, as required by Condition D.13.7 of T165-6462-00009, issued October 1, 2004.

- (f) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Compliance Response Plan, as required by Condition D.13.11(e) of T165-6462-00009, issued October 1, 2004.

## SECTION D.14 SUPPORT OPERATIONS – GENERAL WASTEWATER CONDITIONS

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

The information describing the processes contained in the following facility description is descriptive information and does not constitute enforceable conditions.

- (a) Wastewater Operations – The emission units associated with the wastewater operations can generally be described as storage and transfer facilities (wastewater tanks and containers) and treatment facilities (incineration or off-site treatment). The specific emission units are described in Sections D.8, D.9, D.12 and D.15 of this permit.

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

#### D.14.1 Definition of Wastewater [40 CFR 63.1251 and 40 CFR 63.1256(a)(1)(i)]

- (a) Wastewater in this section of the permit is defined as any water that is discarded from a pharmaceutical manufacturing process unit through a single point of determination (POD) that contains an annual average concentration of partially soluble and/or soluble HAP compounds of at least 5 parts per million by weight and a load of at least 0.05 kg/yr. Wastewater does not include the following:

- (1) Stormwater from segregated sewers;
- (2) Water from fire-fighting and deluge systems, including testing of such systems;
- (3) Spills;
- (4) Water from safety showers;
- (5) Samples of a size not greater than reasonably necessary for the method of analysis that is used;
- (6) Equipment leaks;
- (7) Wastewater drips from procedures such as disconnecting hoses after clearing lines;
- (8) Noncontact cooling water; and
- (9) Primary waste (waste with a net positive heating value).

The primary waste is not considered wastewater because it has not passed through a POD, as it has not exited its last recovery device, the hazardous waste combustor.

- (b) Point of determination (POD) is defined as the point where a wastewater stream exits the process, storage tank, or last recovery device. If soluble and/or partially soluble HAP compounds are not recovered from water before discharge, the discharge point from the process equipment or storage tank is a POD. If water streams are routed to a recovery device, the discharge from the recovery device is a POD. There can be more than one POD per process or pharmaceutical manufacturing process unit. [40 CFR 63.1251]
- (c) Affected wastewater is defined as follows:
- (1) Any wastewater stream containing partially soluble HAP compounds at an annual average concentration greater than 1,300 ppmw, and the total soluble and partially soluble HAP load in all wastewater from the PMPU exceeds 0.25 Mg/yr; or [40 CFR 63.1256(a)(1)(i)(A)]

- (2) Any wastewater stream containing partially soluble and/or soluble HAP compounds at an annual average concentration greater than 5,200 ppmw, and the total soluble and partially soluble HAP load in all wastewater from the PMPU exceeds 0.25 Mg/yr. [40 CFR 63.1256(a)(1)(i)(B)]

#### D.14.2 Maintenance Wastewater [40 CFR 63.1256(a)(4)(iii)]

The Permittee shall prepare a maintenance wastewater plan and implement this plan as part of the Startup, Shutdown, and Malfunction (SSM) Plan as required under 40 CFR 63.6(e)(3). [40 CFR 63.1256(a)(4)(iii)]

Maintenance wastewater is exempt from all other provisions of 40 CFR 63.1256 except 40 CFR 63.1256(a)(4)(ii).

#### D.14.3 Storage and Transfer of Affected Wastewater [40 CFR 63.1256(b), (d), and (e)] [326 IAC 2-2-3]

- (a) The following emission units are used to store or transfer affected wastewater:
  - (1) Waste Containers – The emission units and performance standards are described in Section D.9 of this permit.
  - (2) **Reserved**
  - (3) Affected Wastewater Tanks – These emission units and performance standards are streamlined with the requirements for waste tanks described in Section D.8 of this permit.
- (b) The emission units in the Animal Health Manufacturing operations do not store or transfer affected wastewater.

#### D.14.4 Treatment of Affected Wastewater [40 CFR 63.1256] [326 IAC 2-2-3]

Pursuant to the Pharmaceutical MACT requirements under 40 CFR 63.1256 and 326 IAC 2-2-3, the affected wastewater shall be treated using the following methods as applicable:

- (a) Waste incineration – The equipment and performance standards for the thermal destruction of the affected wastewater by incineration are described in Section D.12 of this permit.
- (b) Transfer of affected wastewater streams for offsite treatment – The performance standards for offsite disposal of affected wastewater are described in Section D.15 of this permit.

### **Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.14.5 Testing and Monitoring Requirements

The testing and monitoring requirements for the storage, transfer and treatment of the affected wastewater are described in Sections D.8, D.9, D.12, and D.15 of this permit.

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

#### D.14.6 Record Keeping and Reporting Requirements

- (a) The following record keeping and reporting requirements apply to the maintenance wastewater plan required under 40 CFR 63.1256(a)(4)(iv) and 63.6(e)(3):
  - (1) Maintain record of original maintenance wastewater plan for the life of the affected source or until the affected source is no longer subject to the provisions of this rule;
  - (2) Maintain updated versions of the maintenance wastewater plan, as necessary;

- (3) Maintain records for each instance the plan was implemented and whether the plan was followed; and
  - (4) Record and report all instances within 2 working days after commencing actions inconsistent with the maintenance wastewater plan, followed by a written letter within 7 working days after the end of the event.
- (b) Each POD as defined in Condition D.14.1(b) shall be identified and its wastewater HAP concentration documented in the On-Site Implementation Log (OSIL) as required by 40 CFR 63.1259(b)(6) and 40 CFR 63.1251 – Operating scenario. The operating scenario requirements are described in Condition F.1.10 in Section F.1 of this permit.

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-12 and 326 IAC 2-2]**

**D.14.7 Modifications and Construction: Advance Approval of Permit Conditions**

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The emission units described in this D section are not subject to the advance approval permit conditions.

## **SECTION D.15 SUPPORT OPERATIONS – TRANSFER OF AFFECTED WASTEWATER FOR OFFSITE TREATMENT CONDITIONS**

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

The information in this facility description section does not constitute enforceable conditions. The transfer of affected wastewater for offsite treatment relates to either of the following situations:

- (a) Shipment of affected wastewater stored onsite to an offsite treatment facility; or
- (b) Receipt of an offsite affected wastewater to be treated onsite.

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

#### **D.15.1 Shipment of Affected Wastewater to an Offsite Treatment Facility [40 CFR 63.1256(a)(5)]**

- (a) Pursuant to the Pharmaceutical MACT standards for wastewater [40 CFR 63.1256(a)(5)(i)(B)], the Permittee shall include a notice with each shipment of affected wastewater or residual removed from affected wastewater to an offsite treatment facility. The notice shall state that the affected wastewater or residual contains organic HAP that must be treated in accordance with the treatment requirements of the Pharmaceutical MACT standards. When the transport is continuous or ongoing, the notice shall be submitted to the treatment operator initially and whenever there is a change in the required treatment.
- (b) Pursuant to the Pharmaceutical MACT standards for wastewater [40 CFR 63.1256(a)(5)(ii)], the Permittee shall not transfer the affected wastewater or residual unless the transferee has submitted to the EPA a written certification that the transferee will manage and treat any affected wastewater or residual removed from affected wastewater received from a source subject to the requirements of this subpart in accordance with the treatment requirements of the Pharmaceutical MACT standards.

#### **D.15.2 Receipt of Offsite Affected Wastewater for Onsite Treatment [40 CFR 63.1256(a)(5)]**

- (a) Where the Permittee is the transferee, the Permittee shall submit to EPA a written certification that it will manage and treat any affected wastewater or residual removed from affected wastewater received from a source subject to the requirements of this subpart in accordance with the treatment requirements of the Pharmaceutical MACT standards for wastewater [40 CFR 63.1256(a)(5)(ii) and (iv)].
- (b) The Permittee may revoke its certification as allowed under 40 CFR 63.1256(a)(5)(iii).

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

#### **D.15.3 Record Keeping and Reporting Requirements**

The Permittee shall keep records of all notifications required by Conditions D.15.1 and D.15.2 in accordance with 40 CFR 63.1259(g).

### **Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

#### **D.15.4 Modifications and Construction: Advance Approval of Permit Conditions**

The emission units described in this D section are not subject to the advance approval permit conditions.

## SECTION D.16 INSIGNIFICANT ACTIVITIES

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

The information in this facility description section does not constitute enforceable conditions. The source contains the following regulated insignificant activities that are not included in other sections of this permit:

- (a) Cold-cleaning organic solvent degreasing operations that do not exceed 145 gallons of solvent usage per 12 months, except if subject to 326 IAC 20-6.

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

#### D.16.1 Cold-Cleaner Degreasers Constructed between January 1, 1980 and July 1, 1990 [326 IAC 8-3-2]

For each cold-cleaner degreaser constructed between January 1, 1980 and July 1, 1990, the Permittee shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operating requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.16.2 Cold-Cleaner Degreasers Constructed after July 1, 1990 [326 IAC 8-3-5]

For each cold-cleaner degreaser constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than 2 kPa (15 mm Hg or 0.3 psi) measured at 38°C (100°F);
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than 4.3 kPa (32 mm Hg or 0.6 psi) measured at 38°C (100°F), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in Condition D.16.2(6).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one of the following control devices if the solvent volatility is greater than 4.3 kPa (32 mm Hg or 0.6 psi) measured at 38°C (100°F), or if the solvent is heated to a temperature greater than 48.9°C (120°F):
  - (A) A freeboard that attains a freeboard ratio of 0.75 or greater.
  - (B) A water cover when solvent used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
  
- (6) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (A) Close the cover whenever articles are not being handled in the degreaser.
  - (B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (C) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

**D.16.3 Modifications and Construction: Advance Approval of Permit Conditions**

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The emission units described in this D section are not subject to the advance approval permit conditions.

## **SECTION E.1 LEAK DETECTION AND REPAIR (LDAR) CONDITIONS FOR BPM PROCESS SYSTEM COMPONENTS**

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

The following facility information is descriptive information and does not constitute enforceable conditions:

BPM process systems consisted of process operations and non-waste storage serving bulk pharmaceutical manufacturing operations. LDAR applied to BPM process system components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves and lines, valves, connectors, instrumentation systems, control devices, and closed-vent systems intended to operate in volatile organic hazardous air pollutant and/or volatile organic compound (VOHAP/VOC) service for 300 hours or more during the calendar year. In VOHAP/VOC service meant that a piece of equipment either contained or contacted a fluid (liquid or gas) that was at least 5 percent by weight VOHAP/VOC. The Permittee permanently shut down the BPM production and several of the BPM support operations which included all of the BPM process system components that were subject to LDAR requirements of this section. Only a few of these BPM process system components had been in actual operation for some time after October 1, 2004. Many of those BPM process system components still physically exist on-site; however, all of those BPM process system components are designated for demolition. The applicable requirements described or referred to in this D section apply to the BPM process system components that were described in this section of the October 1, 2004 version of the Part 70 operating permit.

### **Emission Limitations and Standards**

E.1.1 and E.1.2 **Reserved**

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

#### **E.1.3 Record Keeping Requirements**

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- (a) From October 1, 2004 to the date on which the Permittee submitted the initial LDAR Report of compliance information in accordance with Condition E.1.3(b)(1) in T165-6462-00009, issued October 1, 2004. Records of information and data related to Condition E.1.1 in T165-6462-00009, issued October 1, 2004, shall be kept in accordance with 40 CFR 63.1255(g), including but not limited to:
- (1) Identification of components that were subject to the rule with information indicating their method of compliance, with justifications as appropriate, except that inaccessible, ceramic, or ceramic-lined connectors subject to 40 CFR 63.1255(f)(4) need not be identified;
  - (2) Schedule for monitoring connectors and valves and the percent connectors and valves found leaking;
  - (3) Design criteria and any changes to these criteria for each dual mechanical seal system;
  - (4) List of equipment designated as unsafe to monitor/inspect or difficult to monitor/inspect and a copy of the plan for monitoring or inspecting such equipment;
  - (5) Equipment complying via the provisions of 40 CFR 63.178(c);
  - (6) List of equipment added or removed since the last monitoring period;

- (7) If monitoring frequencies are adjusted for time in use, records demonstrating the proportion of the time the equipment is in VOC/VOHAP use during the calendar year;
- (8) For components in heavy liquid service, records demonstrating that they are in heavy liquid service;
- (9) Identification of components exempt because they are in VOHAP/VOC service for less than 300 hours per year; and
- (10) Records of reports submitted in accordance with the requirements of Conditions E.1.3(b) and (c) of Part 70 operating permit, dated October 1, 2004.

## **SECTION E.2 LEAK DETECTION AND REPAIR (LDAR) CONDITIONS FOR WASTE SYSTEM COMPONENTS**

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

The following facility description of LDAR components subject to this permit section is descriptive information and does not constitute enforceable conditions:

- (a) LDAR applies to waste system components consisting of pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves and lines, valves, connectors, control devices, and closed-vent systems used to comply with this LDAR program, intended to operate in volatile organic hazardous air pollutant and/or volatile organic compound (VOHAP/VOC) service for 300 hours or more during the calendar year. In VOHAP/VOC service means that a piece or equipment either contains or contacts a fluid (liquid or gas) that is at least 10 percent by weight of total VOHAP/VOC.
- (b) LDAR waste system components are located from the point of delivery of affected wastewater or offsite waste materials to the last component prior to entering the hazardous waste combustor or, from the waste storage tanks to the last component prior to being loaded onto tankers for transport offsite. The closed-vent system not used to control emissions from LDAR components is not subject to the conditions of this section, but instead is subject to the conditions in Sections D.11, as applicable.

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

#### **E.2.1 LDAR Standards for Waste System Components [40 CFR 63.691, 326 IAC 2-2]**

Except as provided in Condition E.2.2, the following LDAR standards satisfy the requirements of the Volatile Organic Liquid Storage Vessel Standards [40 CFR 60.110b], Off-Site Waste and Recovery Operations (OSWRO) MACT Standards [40 CFR 63.691] and Best Available Control Technology (BACT) requirements [326 IAC 2-2-3]:

- (a) The Permittee shall implement the LDAR program under 40 CFR Part 61, Subpart V for all waste system component types listed in item (a) of the facility description section from the point of delivery of affected wastewater or offsite waste materials to the last piece of regulated equipment prior to entering the hazardous waste combustor, or from the waste storage tanks to the last piece of regulated equipment prior to being loaded onto tankers for transport offsite.
- (b) Existing waste system components in VOC/VOHAP service are covered under 40 CFR Parts 264 and 265, Subpart BB. Data taken for purposes of Subpart BB shall satisfy the data requirements for entry into the alternate standard at 40 CFR 61.243-1. Monitoring periods are calendar periods as defined at 40 CFR Part 61, Subpart V and 40 CFR Parts 264 and 265, Subpart BB.
- (c) Each new or changed waste system component in VOC/VOHAP service identified during the course of each monitoring period shall be incorporated into the existing component list as necessary within 90 days, or by the next LDAR Periodic Report, following the end of the monitoring period for the type of component monitored, whichever is later.
- (d) The following waste system components in VOHAP/VOC service shall comply with design standards, shall be operated in accordance with work practice standards, or shall undergo periodic LDAR monitoring in accordance with the provisions cited below. Periodic LDAR monitoring shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 21. The regulatory language cited by reference in this section appears in full in Appendix A.

- (1) Pumps shall be operated in accordance with the standard at 40 CFR 61.242-2. This section provides, generally and in part:
  - (A) Single seal pumps shall undergo periodic monitoring and visual inspections.
  - (B) Dual mechanical seal pumps with a barrier fluid system shall meet design, operation, inspection, and alarm requirements.
  - (C) Pumps designed without a shaft penetrating the pump housing shall be monitored initially and annually, but are not subject to other inspections.
  - (D) Pumps equipped with a closed-vent system capable of capturing and transporting any leakage from the seals back to the process or to a control device are not required to be inspected or monitored.
  - (E) Pumps designated as unsafe-to-monitor shall be monitored according to a written plan by which they are monitored as frequently as possible during safe-to-monitor times, but not more frequently than otherwise applicable.
- (2) Compressors shall be operated in accordance with the standard at 40 CFR 61.242-3. This section provides, generally and in part:
  - (A) Compressors with barrier fluid seal systems shall meet design, operation, inspection, and alarm requirements.
  - (B) Compressors equipped with a closed-vent system to capture and transport leakage from the compressor drive shaft seal back to a process or a fuel gas system or to a control device are not required to be inspected or monitored.
  - (C) Compressors designated to operate with an instrument reading of less than 500 ppmv above background shall be monitored initially and annually, and at other times requested by the Administrator.
- (3) Pressure relief devices in gas/vapor service shall be operated in accordance with the standard at 40 CFR 61.242-4. This section provides, generally and in part:
  - (A) Except during pressure releases, pressure relief devices shall be operated with an instrument reading of less than 500 ppmv above background.
  - (B) After each pressure release, the device shall be returned to a monitored condition of less than 500 ppmv above background within 5 calendar days after the release, except if delay of repair applies.
  - (C) A rupture disk satisfies Conditions E.2.1(d)(3)(A) and (B) without monitoring if it is replaced within 5 calendar days after each pressure release, except if delay of repair applies.
  - (D) Any pressure relief device satisfies Conditions E.2.1(d)(3)(A) and (B) without monitoring if it is routed to a process or fuel gas system or equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device.
- (4) Sampling Connection Systems shall be operated in accordance with the standard at 40 CFR 61.242-5. This section provides, generally and in part:

- (A) Gases displaced during filling of a sample container are not required to be captured or collected.
- (B) Each sampling connection system shall be equipped with a closed-purge, closed-loop or closed-vent system which shall:
  - (i) Return the purged process fluid directly to the process line; or
  - (ii) Collect and recycle the purged process fluid; or
  - (iii) Be designed and operated to capture and transport the purged process fluid to a control device that complies with the requirements of 40 CFR 61.242-11; or
  - (iv) Collect, store, and transport the purged process fluid to a SOCOMI/HON waste management unit (40 CFR Part 63, Subpart G) operated according to the provisions which apply to Group 1 wastewater streams, or to a treatment, storage, or disposal facility subject to regulation under 40 CFR Part 262, 264, 265 or 266 (a RCRA unit), or, if the purged fluids are not hazardous waste, to a facility with an appropriate State permit to manage municipal or industrial solid waste.

In-situ sampling systems, and sampling systems without purges, are exempt from the requirements of Conditions E.2.1(d)(4)(B)(i) through (iv).

- (5) Open-ended valves or lines shall be operated in accordance with the standard at 40 CFR 61.242-6. This section provides, generally and in part:
  - (A) Each open-ended valve and line shall be equipped with a cap, blind flange, plug or second valve, which shall seal the open end at all times except when operations require fluid flow through the open-ended valve or line.
  - (B) If a second valve is used, the valve on the process fluid end shall be closed before the other valve is closed.
  - (C) If a double block and bleed arrangement is used, the bleed valve or line may remain open during operations requiring venting the line between the block valves, but shall be closed otherwise in accordance with Condition E.2.1(d)(5)(B).
  - (D) Open-ended valves and lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are not required to comply with Conditions E.2.1(d)(5)(A) through (C).
  - (E) Open-ended valves or lines containing materials which would autocatalytically polymerize are not required to comply with Conditions E.2.1(d)(5)(A) through (C).
  - (F) Open-ended valves or lines containing materials which could cause a serious safety hazard if capped or equipped with a double block and bleed system are not required to comply with Conditions E.2.1(d)(5)(A) through (C).
- (6) Valves shall be operated in accordance with the standard at 40 CFR 61.242-7. This section provides, generally and in part:
  - (A) Each valve shall be monitored monthly, except as provided below.

- (B) Any valve may be monitored quarterly, in the first month of the quarter, if it has completed two successive months without a leak, as long as it does not leak.
  - (C) Each leaking valve shall be monitored monthly after it is repaired until it has completed two successive months without a leak.
  - (D) Valves designed for no detectable emissions, which have no external actuating mechanism in contact with process fluid, are required only to be monitored initially and annually.
  - (E) Valves designated as unsafe-to-monitor are required to be monitored only according to a written plan which provides for their monitoring during safe-to-monitor times.
  - (F) Valves designated as difficult-to-monitor are required to be monitored only according to a written plan that provides for their monitoring at least once per year.
- (7) Pressure relief devices in liquid service and connectors shall be operated in accordance with the standard at 40 CFR 61.242-8. This section provides, generally and in part:
- (A) If a component presents visual, audible, or olfactory evidence of a leak, the leak shall be deemed repaired without monitoring if the visual, audible, or olfactory evidence has been eliminated.
  - (B) If there is visual, audible, or olfactory evidence of a leak at one of these components, and the leak is not repaired without monitoring, the component shall be monitored within 5 calendar days to confirm whether a leak is in fact present.
- (8) Closed-vent systems and control devices used to comply with Section E.2 of this permit shall be operated in accordance with the standard at 40 CFR 61.242-11, as may be applicable. Operation of these systems in conformance with Section D.11 shall satisfy these requirements.
- (9) As an alternative to complying with Condition E.2.1(d)(6), above, valves may comply with the Alternative Standards for Valves - Allowable Percentage of Valves Leaking under 40 CFR 61.243-1. This section provides, generally and in part:
- (A) Upon 90 days advance notice to the Administrator, the designated process unit shall have no more than 2.0 percent leaking valves.
  - (B) All valves in the designated process unit shall be monitored initially upon designation, and annually thereafter.
  - (C) The annual monitoring of all valves in the designated process unit shall be completed within one week.
  - (D) Valve leaks detected shall be repaired within 15 days, except if delay of repair applies, in accordance with 40 CFR 61.242-7(d) and (e).
- (10) As an alternative to complying with the monitoring requirements in Condition E.2.1(d)(6), above, with respect to monitoring requirements alone, valves may comply with one of the Alternative Standards for Valves - Skip Period

Leak Detection and Repair under 40 CFR 61.243-2. This section provides, generally and in part:

- (A) All valves in the process unit shall comply initially with the monitoring requirements of Condition E.2.1(d)(6).
  - (B) After 2 consecutive quarterly monitoring periods with the percent leaking valves in the process unit at less than or equal to 2.0 percent, and upon 90 days advance notice to the Administrator, the designated process unit may begin to skip one of the quarterly monitoring periods; or  
  
After 5 consecutive quarterly monitoring periods with the percent leaking valves in the process unit at less than or equal to 2.0 percent, and upon notice to the Administrator, the designated process unit may begin to skip three of the quarterly monitoring periods.
  - (C) If for any monitoring period, the percentage of leaking valves exceeds 2.0 percent, all valves in the process unit shall comply with the monitoring requirements of Condition E.2.1(d)(6), but may again elect to use this alternative.
- (e) Any visible leak of a liquid containing VOHAP/VOC shall be considered a leak for purposes of the obligation to repair. If it is not clear whether the liquid contains VOHAP/VOC, then Method 21 may be used to confirm whether a leak exists. For each component type, the relevant leak definition in Condition E.2.1(d) shall apply for this purpose. All leaks shall be marked as provided in 40 CFR 61.246(b) with a weatherproof and readily visible identification marked with the equipment identification number. This identification may be removed from the equipment after it has been successfully repaired, except that the identification on a leaking valve may not be removed until the valve has been monitored for 2 successive months without a leak being detected.
- (f) The Permittee shall initiate repair of any leak no later than 5 calendar days after identification, and complete the repair within 15 days after identification, except where delay of repair is allowed under 40 CFR 61.242-10. This shall not affect repair periods under Condition E.2.1(d)(3). 40 CFR 61.242-10 provides, generally and in part:
- (1) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.
  - (2) Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process and that does not remain in VOC/VOHAP service.
  - (3) Delay of repair for valves will be allowed if emissions from immediate repair attempts would result in greater emissions than delay of repair, and if purged material generated during the repair is collected and destroyed or recovered in a control device.
  - (4) Delay of repair for pumps will be allowed if the repair requires the use of a dual mechanical seal system, and is completed within 6 months.
  - (5) Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, but the supplies, although adequately stocked, have been depleted. Delay of repair beyond the second process unit shutdown is not allowed unless the second shutdown occurs sooner than 6 months after the first shutdown.

- (g) Alternative means of emission limitations not already included in 40 CFR Part 61, Subpart V may be approved in accordance with 40 CFR 61.242-1(c) and 61.244.

#### **E.2.2 Exceptions to LDAR Standards for Waste System Components**

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The following equipment types are not subject to the LDAR standards described in Condition E.2.1:

- (a) Research and development facilities, activities and equipment;
- (b) Components on transportation equipment and containers such as tanker trucks, railroad cars, and drums (40 CFR 63.1256 and 40 CFR Part 63, Subpart DD);
- (c) Process systems including non-waste storage and process operations that are not used for handling affected wastewater or offsite waste materials;
- (d) Utilities and non-process lines;
- (e) Components in vacuum service (40 CFR 61.242-1);
- (f) Equipment in VOC/VOHAP service but that is in such service less than 300 hours per calendar year [40 CFR 63.680(c)(3)(iii)]; and
- (g) Closed loop heat exchange systems.

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

##### **E.2.3 Record Keeping and Reporting Requirements**

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- (a) Records of information and data related to Condition E.2.1 shall be kept in accordance with 40 CFR 61.246, including but not limited to:
  - (1) Identification of components that are subject to the rule with information indicating their method of compliance, with justifications and signatures as appropriate. No identification is required for welded fittings;
  - (2) For valves complying via the “skip period” alternative, a schedule for monitoring the valves and the percent valves found leaking during each monitoring period;
  - (3) Changes to each dual mechanical seal system design and operating criteria, including seal system failure criteria;
  - (4) List of equipment designated as unsafe to monitor/inspect or difficult to monitor/inspect, with the reason for the designation, and a copy of the plan for monitoring or inspecting such equipment;
  - (5) Records of leaks detected, repair information, and delays of repair;
  - (6) Records of compliance tests on equipment (compressors, pumps, or valves) designated for no detectable emissions and for pressure relief devices in gas/vapor service;
  - (7) Records for closed-vent systems and control devices, subject to Condition E.2.1(d)(8);
  - (8) Records of information supporting designation that components are not in VOHAP/VOC service or are in vacuum service;
  - (9) Identification of components exempt because they are in VOC/VOHAP service for less than 300 hours per year;

- (10) Records of alternative means of compliance determination; and
  - (11) Records may be kept in one or more record keeping systems, providing each record is identified by process unit.
- (b) Reporting requirements for information and data related to Condition E.2.1 shall be conducted in accordance with 40 CFR 61.247, including:
- (1) The Initial LDAR Report of compliance information for this permit shall be submitted within 90 days after issuance of this permit and shall identify in the report each process group and its applicable rules, approximate number of components in VOHAP/VOC service, and method of compliance.
  - (2) The final independent OSWRO MACT LDAR Periodic Report shall be submitted by July 30, 2004 covering the monitoring period from January 1, 2004 to June 30, 2004.
  - (3) The first streamlined Waste System LDAR Periodic Report shall be submitted by January 30, 2005 and shall cover the following monitoring periods:
    - (A) For BACT, this report shall cover the monitoring period from the date of issuance of this permit through December 31, 2004.
    - (B) For OSWRO MACT, this report shall cover the monitoring period from July 1, 2004 to December 31, 2004.
  - (4) Subsequent LDAR Periodic Reports shall cover the periods from January 1 to June 30, and July 1 to December 31, respectively. Reports shall be submitted 30 days following the 6-month period. The report shall include any revisions to the information reported earlier if the method of compliance has changed since the last report. The report shall also contain the following information, divided and identified by process unit:
    - (A) For each month during the period covered by the report, the number of leaks detected for valves, pumps, and compressors and the number not repaired within 15 days, with the facts that explain any delay of repairs, and, where appropriate, why a process unit shutdown was technically infeasible;
    - (B) The results of all performance tests and monitoring to determine compliance with the alternative standards for valves at 40 CFR 61.243-1 and 61.243-2;
    - (C) Results of all monitoring and performance tests required to determine compliance with no detectable emissions; and
    - (D) The dates of process unit shutdowns which occurred during the reporting period.
- (c) Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.

#### **Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12, 326 IAC 2-2]**

##### **E.2.4 Modifications and Construction: Advance Approval of Permit Conditions**

- (a) The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC

2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

- (b) The Permittee may construct and install new emission units of the types described in this section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

## SECTION F.1 CHANGE MANAGEMENT AND FLEXIBLE PERMIT CONDITIONS

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

The information described in the following paragraphs is descriptive information and does not constitute enforceable conditions:

- (a) The operations in the areas of the plant site listed below are subject to the change management and flexible permit conditions described in this section. These conditions apply to all emission units listed in the specific sections of the permit listed below and emission units added to the site pursuant to the provisions of this section:
  - (1) D.8 Waste Storage Tank Operations
  - (2) D.9 Waste Containers
  - (3) D.11 Control Systems – RTO Operations
  - (4) D.12 Incineration – TO3/TO4 Liquid Waste Incinerators
  - (5) E.2 LDAR – Waste System Components
  
- (b) The operations in the areas listed below are not subject to the change management and flexible permit conditions in this section:
  - (1) D.1 Utilities
  - (2) D.2 AHM – Fermentation
  - (3) D.3 AHM – Product Recovery
  - (4) D.4 AHM – Product Finishing
  - (5) D.5 BPM – Production Operations
  - (6) D.6 BPM – Solvent Recovery Operations
  - (7) D.7 BPM – Solvent Storage Tank Operations
  - (8) D.10 BPM – Individual Drain Systems
  - (9) D.13 Incineration – Bartlett-Snow Solid Waste Incinerator
  - (10) D.14 General Wastewater Conditions
  - (11) D.15 Waste Transfer Activities
  - (12) D.16 Insignificant Activities (described in Section A and outside the operations in the areas of the plant site that are subject to the change management and flexible permit conditions)
  - (13) E.1 LDAR – BPM Process System Components

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

#### F.1.1 Emission Limits [326 IAC 2-2]

- (a) Carbon monoxide (CO) emissions from the facilities operating under the flexible permit conditions shall not exceed 300 tons per 12-month period, rolled on a calendar month basis.
  
- (b) Fluorides emissions from the facilities operating under the flexible permit conditions shall not exceed 9 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:
  - (1) 5.5 tons of fluorides emissions from the TO3/TO4 liquid incinerators; and
  - (2) 3.5 tons of fluorides emissions from the RTOs.
  
- (c) NO<sub>x</sub> emissions from the facilities operating under the flexible permit conditions shall not exceed 650 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:

- (1) 350 tons of NO<sub>x</sub> emissions from the TO3/TO4 liquid incinerators, and
  - (2) 300 tons of NO<sub>x</sub> emissions from the RTOs.
- (d) SO<sub>2</sub> emissions from the facilities operating under the flexible permit conditions shall not exceed 275 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:
- (1) 200 tons of SO<sub>2</sub> emissions from the TO3/TO4 liquid incinerators, and
  - (2) 75 tons of SO<sub>2</sub> emissions from the RTOs.
- (e) VOC emissions from the facilities operating under the flexible permit conditions shall not exceed 300 tons per 12-month period, rolled on a calendar month basis.

F.1.2 Site Modifications and Advance Approval of Modifications [326 IAC 2-7-5(9)] [326 IAC 2-7-5(16)]

The Permittee may make modifications described in subsection (a) below to the operations in Sections D.8, D.9, D.11, D.12, and E.2 of this permit. If actual emissions do not exceed the limits in Section F.1.1, and the Permittee complies with the other provisions of this section, then the Permittee is not required to obtain a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2).

(a) Permitted Modifications

The Permittee may implement changes, including but not limited to, the following modifications without triggering the administrative review processes described above:

- (1) Support Operations:
  - (A) A change in the method of operation to a process or existing equipment;
  - (B) Piping changes, including but not limited to, process piping, waste piping and fume transport piping;
  - (C) A physical change to existing equipment;
  - (D) Reconstruction or replacement of existing equipment, including but not limited to, storage tanks and container transfer operations;
  - (E) Installation of new equipment, including but not limited to, storage tanks, and container transfer operations;
  - (F) Reconstruction or replacement of existing storage tanks; and
  - (G) Installation of new storage tanks.
- (2) TO3/TO4 Liquid Waste Incinerators:
  - (A) A change in waste materials disposed in the incinerators;
  - (B) A change in the use of portable containers, including but not limited to, drums, melons, and tank trailers;
  - (C) A change in the method of operation that does not affect compliance with 40 CFR Part 63, Subpart EEE;
  - (D) Piping changes;

- (E) A physical change that does not affect compliance with 40 CFR Part 63, Subpart EEE;
  - (F) Reconstruction or replacement of incinerator components and support equipment, including but not limited to, cooling towers and waste container management; and
  - (G) Installation of new incinerator equipment components, support equipment or emission control equipment.
- (b) **Advance Approval and Applicable Requirements**  
In addition to the emission limits identified in Condition F.1.1 of this permit, the emission limits and standards, testing and monitoring requirements, record keeping requirements, reporting requirements, and other permit conditions applicable to the type of equipment or operation being modified, replaced, reconstructed or installed are described in Sections D.8, D.9, D.11, D.12 and E.2 of this permit. Each modification will be subject to the relevant provisions of those permit conditions. If a modification would cause an applicable requirement that is not described in this permit to apply, the Permittee shall obtain a source modification approval if otherwise required by 326 IAC 2-7-10.5 and a Title V permit modification pursuant to 326 IAC 2-7-12.

#### F.1.3 Carbon Monoxide (CO) Emission Limit Determination

The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the RTOs and the TO3/TO4 liquid waste incinerators:
  - (1) **CO measurement:** The Permittee shall measure CO concentration in the exhaust from the RTOs and TO3/TO4 liquid waste incinerators with a CO continuous emission monitoring system (CEMS) or follow the data substitution requirements in Condition F.1.3(a)(5).
  - (2) **Flow rate measurement:** The Permittee shall measure the actual exhaust gas flow rate from the RTOs and TO3/TO4 liquid waste incinerators with a flow monitoring system or follow the data substitution requirements in Condition F.1.3(a)(5).
  - (3) **Mass emission calculation:** The Permittee shall calculate CO emissions, in tons, each calendar month by using the CO concentration data and flow rate data.
  - (4) **Minimum data collection requirements:**
    - (A) For the RTOs, the requirements for monitoring and recording CO concentrations and exhaust gas flow rate are described in Section D.11.
    - (B) For the TO3/TO4 liquid waste incinerators, the requirements for monitoring and recording CO concentrations and exhaust gas flow rate are described in Section D.12.
  - (5) **Data substitution:**
    - (A) During periods of CEMS calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute CO concentration measurement obtained prior to the calibration in lieu of actual readings from the CO CEMS.

- (B) During periods of flow meter calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute exhaust gas flow rate measurement obtained prior to the calibration in lieu of actual readings from the flow meter.
- (C) During periods of CEMS maintenance, malfunction, or repair; other periods of invalid CO data collection; or any periods when CO CEMS may not be operating and its operation is not required for compliance with Sections D.11 and D.12 (such as, when the RTOs are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the CO CEMS:
  - (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the CO emissions determined by multiplying the actual natural gas flow rate [in million cubic feet (mmcf)] for the RTOs and either the actual natural gas flow rate (in mmcf) or the maximum natural gas flow rate (0.0010833 mmcf) for each of the TO3/TO4 liquid waste incinerators, by the EPA AP-42 emission factor of 84 lb/mmcf for external combustion sources.
  - (ii) When burning waste fumes or incinerating a waste stream, the following CO concentrations shall be substituted:
    - (a) RTOs CO concentration = 73 ppmv
    - (b) TO3/TO4 CO concentration = 100 ppmvd
- (D) During periods of flow meter maintenance, malfunction, or repair; other periods of invalid exhaust gas flow rate data collection; or any periods when flow meter may not be operating and its operation is not required for compliance with Sections D.11 and D.12 (such as, when the RTOs are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the flow meter:
  - (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the CO emissions determined by multiplying the actual natural gas flow rate (in mmcf) for the RTOs and either the actual natural gas flow rate (in mmcf) or the maximum natural gas flow rate (0.0010833 mmcf) for each of the TO3/TO4 liquid waste incinerators, by the EPA AP-42 emission factor of 84 lb/mmcf for external combustion sources.
  - (ii) When burning waste fumes or incinerating a waste stream, the following exhaust gas flow rates shall be substituted:
    - (a) RTOs exhaust gas flow rate = 101,600 scfm
    - (b) TO3/TO4 exhaust gas flow rate = 14,560 dscfm

#### F.1.4 Fluorides Emission Limit Determination

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The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the RTOs and the TO3/TO4 liquid waste incinerators:
  - (1) **Uncontrolled hydrogen fluoride emissions:** The Permittee shall determine the mass of fluorine atoms emitted to the RTOs and TO3/TO4 liquid waste incinerators [as components of fluorine containing compounds] by support

operations, by using engineering calculation methods based on ideal gas law equations, stoichiometry and mass balance. All fluorine atoms shall be considered emitted as hydrogen fluoride (HF) after combustion in the RTOs or the TO3/TO4 liquid waste incinerators.

- (2) **HF control efficiency:** The Permittee shall base fluorides emissions on an RTO and TO3/TO4 scrubber control efficiency of 98%. If the monitoring data is not available or indicates the scrubbers are not achieving this control efficiency, the Permittee shall use a control efficiency of zero percent (0%).
- (3) **Emission calculation:** The Permittee shall calculate fluorides emissions, in tons, for each calendar month by multiplying the amount of HF created by combustion of the fluorine atoms in the RTOs and TO3/TO4 liquid waste incinerators by the respective HF control efficiency.

#### F.1.5 Nitrogen Oxides (NO<sub>x</sub>) Emission Limit Determination

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The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the RTOs and the TO3/TO4 liquid waste incinerators:
  - (1) **NO<sub>x</sub> measurement:** The Permittee shall measure NO<sub>x</sub> concentration in the exhaust with a NO<sub>x</sub> continuous emission monitoring system (CEMS) or follow the data substitution requirements in Condition F.1.5(a)(4).
  - (2) **Flow rate measurement:** The Permittee shall measure the actual exhaust gas flow rate from the RTOs and the TO3/TO4 liquid waste incinerators with a flow monitoring system or follow the data substitution requirements in Condition F.1.5(a)(4).
  - (3) **Emission calculation:** The Permittee shall calculate NO<sub>x</sub> emissions, in tons, each calendar month by using the NO<sub>x</sub> concentration data and flow rate data.
  - (4) **Data substitution:**
    - (A) During periods of CEMS calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute NO<sub>x</sub> concentration measurement obtained prior to the calibration in lieu of actual readings from the NO<sub>x</sub> CEMS.
    - (B) During periods of flow meter calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute exhaust gas flow rate measurement obtained prior to the calibration in lieu of actual readings from the flow meter.
    - (C) During periods of CEMS maintenance, malfunction, or repair; other periods of invalid NO<sub>x</sub> data collection; or any periods when NO<sub>x</sub> CEMS may not be operating and its operation is not required for compliance with Sections D.11 and D.12 (such as, when the RTOs or TO3/TO4 incinerators are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the NO<sub>x</sub> CEMS:
      - (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the NO<sub>x</sub> emissions determined by multiplying the actual natural gas flow rate (in mmcf) for the RTOs and either the actual natural gas flow rate (in mmcf) or the maximum natural gas flow rate (0.0010833 mmcf) for each of the TO3/TO4 liquid waste incinerators, by the EPA

AP-42 emission factor of 140 lb/mmcf for external combustion sources.

- (ii) When burning waste fumes or incinerating a waste stream, the following NO<sub>x</sub> concentrations shall be substituted:
  - a. RTOs NO<sub>x</sub> concentration = 91 ppmv
  - b. TO3/TO4 NO<sub>x</sub> concentration = 975 ppmvdc
- (D) During periods of flow meter maintenance, malfunction, or repair; other periods of invalid exhaust gas flow rate data collection; or any periods when flow meter may not be operating and its operation is not required for compliance with Sections D.11 and D.12 (such as, when the RTOs are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the flow meter:
  - (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the NO<sub>x</sub> emissions determined by multiplying the actual natural gas flow rate (in mmcf) for the RTOs and either the actual natural gas flow rate (in mmcf) or the maximum natural gas flow rate (0.0010833 mmcf) for each of the TO3/TO4 liquid waste incinerators, by the EPA AP-42 emission factor of 140 lb/mmcf for external combustion sources.
  - (ii) When burning waste fumes or incinerating a waste stream, the following exhaust gas flow rates shall be substituted:
    - a. RTOs exhaust gas flow rate = 101,600 scfm
    - b. TO3/TO4 exhaust gas flow rate = 14,560 dscfm
- (5) **Minimum data collection requirements:**
  - (A) For the RTOs, the requirements for monitoring and recording NO<sub>x</sub> concentrations and exhaust gas flow rate are described in Section D.11.
  - (B) For the TO3/TO4 liquid waste incinerators, the requirements for monitoring and recording NO<sub>x</sub> concentrations and exhaust gas flow rate are described in Section D.12.

#### F.1.6 Sulfur Dioxide (SO<sub>2</sub>) Emission Limit Determination

The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the TO3/TO4 liquid waste incinerators, and the RTOs when using CEMS to comply with the SO<sub>2</sub> concentration limitations:
  - (1) **SO<sub>2</sub> measurement:** The Permittee shall measure SO<sub>2</sub> concentration in the exhaust with a SO<sub>2</sub> continuous emission monitoring system (CEMS) or follow the data substitution requirements in Condition F.1.6(a)(4).
  - (2) **Flow rate measurement:** The Permittee shall measure the actual exhaust gas flow rate from the RTOs and TO3/TO4 liquid waste incinerators with a flow monitoring system or follow the data substitution requirements in Condition F.1.6(a)(4).
  - (3) **Emission calculation:** The Permittee shall calculate SO<sub>2</sub> emissions, in tons, each calendar month by using the SO<sub>2</sub> concentration data and flow rate data.

(4) **Data substitution:**

- (A) During periods of CEMS calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute SO<sub>2</sub> concentration measurement obtained prior to the calibration in lieu of actual readings from the SO<sub>2</sub> CEMS.
- (B) During periods of flow meter calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute exhaust gas flow rate measurement obtained prior to the calibration in lieu of actual readings from the flow meter.
- (C) During periods of CEMS maintenance, malfunction, or repair; other periods of invalid SO<sub>2</sub> data collection; or any periods when SO<sub>2</sub> CEMS may not be operating and its operation is not required for compliance with Sections D.11 and D.12 (such as, when the RTOs and TO3/TO4 incinerators are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the SO<sub>2</sub> CEMS:
  - (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the SO<sub>2</sub> emissions determined by multiplying the actual natural gas flow rate (in mmcf) for the RTOs and either the actual natural gas flow rate (in mmcf) or the maximum natural gas flow rate (0.0010833 mmcf) for each of the TO3/TO4 liquid waste incinerators, by the EPA AP-42 emission factor of 0.6 lb/mmcf for external combustion sources.
  - (ii) When burning waste fumes or incinerating a waste stream, the following SO<sub>2</sub> concentrations shall be substituted:
    - a. RTOs SO<sub>2</sub> concentration = 100 ppmv
    - b. TO3/TO4 SO<sub>2</sub> concentration = 500 ppmvd
- (D) During periods of flow meter maintenance, malfunction, or repair; other periods of invalid exhaust gas flow rate data collection; or any periods when flow meter may not be operating and its operation is not required for compliance with Sections D.11 and D.12 (such as, when the RTOs are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the flow meter:
  - (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the SO<sub>2</sub> emissions determined by multiplying the actual natural gas flow rate (in mmcf) for the RTOs and either the actual natural gas flow rate (in mmcf) or the maximum natural gas flow rate (0.0010833 mmcf) for each of the TO3/TO4 liquid waste incinerators, by the EPA AP-42 emission factor of 0.6 lb/mmcf for external combustion sources.
  - (ii) When burning waste fumes or incinerating a waste stream, the following exhaust gas flow rates shall be substituted:
    - a. RTO exhaust gas flow rate = 101,600 scfm
    - b. TO3/TO4 exhaust gas flow rate = 14,560 dscfm

(5) **Minimum data collection requirements:**

- (A) When using SO<sub>2</sub> CEMS for the RTOs, the requirements for monitoring and recording SO<sub>2</sub> concentrations and exhaust gas flow rate are described in Section D.11.
  - (B) For the TO3/TO4 liquid waste incinerators, the requirements for monitoring and recording SO<sub>2</sub> concentrations and exhaust gas flow rate are described in Section D.12.
- (b) The following requirements apply to the RTOs when complying with the 97.5% SO<sub>2</sub> emission reduction requirements:
- (1) **SO<sub>2</sub> emission calculation for natural gas usage:** The Permittee shall determine the amount of natural gas burned by the RTOs each calendar month. The Permittee shall calculate SO<sub>2</sub> emissions from natural gas combustion, in tons, each calendar month by multiplying the monthly natural gas usage by an emission factor of 0.6 lb/mmcf and converting the resulting emissions to tons.
  - (2) **SO<sub>2</sub> emission calculation from operations exhausting to the RTOs:** The Permittee shall determine the mass of sulfur atoms emitted to the RTOs [as components of sulfur containing compounds] by support operations, by using engineering calculation methods based on ideal gas law equations, stoichiometry and mass balance. All sulfur atoms shall be considered emitted as sulfur dioxide (SO<sub>2</sub>) after combustion in the RTOs. The Permittee shall base SO<sub>2</sub> emissions on an RTO scrubber control efficiency of 97.5%. If the monitoring data is not available or indicates the scrubbers are not achieving this control efficiency, the Permittee shall use a control efficiency of zero percent (0%).
  - (3) **Emission calculation:** The Permittee shall calculate sulfur dioxide emissions, in tons, for each calendar month by multiplying the amount of SO<sub>2</sub> created by combustion of the sulfur atoms in the RTOs by the respective SO<sub>2</sub> control efficiency.
  - (4) **Reserved.**
  - (5) **Data substitution:** During periods of time when the Permittee is unable to determine natural gas usage because of auditing, calibration, maintenance, malfunction, repair, or other periods when the natural gas meters for the RTOs are not collecting valid data, the Permittee shall determine SO<sub>2</sub> emissions based on a natural gas consumption rate of 0.036 mmscf/hour [based on the nominal heat input rate of 36 MMBtu/hr per RTO].

#### F.1.7 Volatile Organic Compound (VOC) Emission Limit Determination

The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the RTOs when compliance is based on the 20 ppmv alternative standard:
  - (1) **VOC measurement:** The Permittee shall directly measure TOC concentration, as methane, in the exhaust gas using a TOC continuous emission monitoring system (CEMS) or follow the data substitution requirements in Condition F.1.7(a)(4). The Permittee shall assume VOC, a subset of total organic carbon (TOC), is equal to TOC.
  - (2) **Flow rate measurement:** The Permittee shall measure the actual exhaust gas flow rate from the RTOs with a flow monitoring system or follow the data substitution requirements in Condition F.1.7(a)(4).

- (3) **Emission calculation:** The Permittee shall calculate VOC emissions, in tons, each calendar month by using the TOC concentration data, measured as methane (Molecular Weight = 16), and exhaust gas flow rate data.
- (4) **Data substitution:**
- (A) During periods of CEMS calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute TOC concentration measurement obtained prior to the calibration in lieu of actual readings from the TOC CEMS.
- (B) During periods of flow meter calibration, the Permittee shall substitute, in one-minute increments, the last valid one-minute exhaust gas flow rate measurement obtained prior to the calibration in lieu of actual readings from the flow meter.
- (C) During periods of CEMS maintenance, malfunction, or repair; other periods of invalid TOC data collection; or any periods when TOC CEMS may not be operating and its operation is not required for compliance with Section D.11 (such as, when the RTOs are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the TOC CEMS:
- (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the VOC emissions determined by multiplying the actual natural gas flow rate (in mmcf) by the EPA AP-42 emission factor of 5.5 lb/mmcf for external combustion sources.
- (ii) When burning waste fumes, the following TOC concentration shall be substituted:
- RTOs TOC concentration = 20 ppmv (as methane)
- (D) During periods of flow meter maintenance, malfunction, or repair; other periods of invalid exhaust gas flow rate data collection; or any periods when flow meter may not be operating and its operation is not required for compliance with Section D.11 (such as, when the RTOs are burning only natural gas), the Permittee shall substitute the following data in lieu of actual readings from the flow meter:
- (i) When combusting only natural gas, the Permittee shall substitute, in one-minute increments, the VOC emissions determined by multiplying the actual natural gas flow rate (in mmcf) by the EPA AP-42 emission factor of 5.5 lb/mmcf for external combustion sources.
- (ii) When burning waste fumes, the following exhaust gas flow rate shall be substituted:
- RTOs exhaust gas flow rate = 101,600 scfm
- (5) **Minimum data collection requirements:**
- The requirements for monitoring and recording VOC concentrations and exhaust gas flow rate are described in Section D.11.
- (6) **Emissions during RTO bypass periods:** The Permittee shall include any known VOC emissions from waste storage tanks not emitted through the RTO

due to diversions in the fume transport system. The Permittee may use engineering calculation methods based on ideal gas law equations, stoichiometry, or mass balance to estimate these emissions.

(b) The following requirements apply to the RTOs when compliance is based on the 98% control efficiency standard:

(1) **VOC emission calculation for natural gas usage:** The Permittee shall determine the amount of natural gas burned by the RTOs each calendar month. The Permittee shall calculate VOC emissions from natural gas combustion, in tons, each calendar month by multiplying the monthly natural gas usage by an emission factor of 5.5 lb/mmcf and converting the resulting emissions to tons.

(2) **VOC emission calculation from support operations exhausting to the RTOs:** The Permittee shall use the following emission factors for estimating uncontrolled VOC emissions from the support operations (waste storage tanks):

Activity	VOC Emission Factor
	C9 Tank Farm
Primary Waste Charging	1.74 lb/1,000 gal
Secondary Waste Charging	1.905 lb/1,000 gal
Diurnal Losses from Primary Waste Tanks	14.32 lb/day
Diurnal Losses from Secondary Waste Tanks	45.26 lb/day

The Permittee shall base VOC emissions on an RTO control efficiency of 98%. If the monitoring data is not available or indicates the RTO is not achieving this control efficiency, the Permittee shall use a control efficiency of zero percent (0%).

(3) **Data substitution:** During periods of time when the Permittee is unable to determine natural gas usage because of auditing, calibration, maintenance, malfunction, repair, or other periods when the natural gas meters for the RTOs are not collecting valid data, the Permittee shall determine VOC emissions based on a natural gas consumption rate of 0.036 mmscf/hour [based on the nominal heat input rate of 36 MMBtu/hr per RTO].

(c) The following requirements apply to the TO3/TO4 liquid waste incinerators:

(1) **Waste stream concentrations:** The Permittee shall use 56.3% by weight as the VOC concentration in the primary waste stream and 5.55% by weight as the VOC concentration in the secondary waste stream.

(2) **Waste stream density:** The Permittee shall use 7.51 lb/gal as the density of the primary waste stream and 8.34 lb/gal as the density of the secondary waste stream, for calculating the amount of wastewater incinerated in tons.

(3) **Amount of waste incinerated:** The Permittee shall determine the amount of primary and secondary wastewater incinerated, in gallons, each month. The Permittee shall convert the amount of primary and secondary wastewater incinerated to pounds by multiplying the amount in gallons by the primary and secondary waste stream density, respectively.

(4) The Permittee shall determine the mass of volatile organic compounds incinerated each month by multiplying the amount of primary and secondary wastewater incinerated during the month, in pounds, by the concentration of volatile organic compounds in the primary and secondary waste streams.

- (5) The Permittee shall determine the VOC emissions by multiplying the total mass of VOC incinerated each month by a 99.99% destruction efficiency and converting the resulting emissions to tons.
  - (6) VOC emission calculation for natural gas usage: The Permittee shall determine the amount of natural gas burned by the TO3/TO4 incinerators each calendar month. The Permittee shall calculate VOC emissions from natural gas combustion, in tons, each calendar month by multiplying the monthly natural gas usage by an emission factor of 5.5 lb/mmcf and converting the resulting emissions to tons.
  - (7) Data substitution: During periods of time when the Permittee is unable to determine natural gas usage because of auditing, calibration, maintenance, malfunction, repair, or other periods when the natural gas meters for the TO3/TO4 incinerators are not collecting valid data, the Permittee shall determine VOC emissions based on a natural gas consumption rate of 0.085 mmscf/hour [based on the nominal heat input rate of 85 MMBtu/hr per incinerator].
- (d) **Reserved**
- (e) Fugitive VOC emissions from Support Operations: The Permittee shall determine monthly fugitive VOC emissions using the following calculation methods:
- (1) Emission factors: The Permittee shall develop emission factors to calculate monthly fugitive VOC emissions. The emission factors shall be developed according to the following methods.
    - (A) For each VOC compound that the Permittee reports release of in the annual SARA Title III TRI report (“reportable SARA VOCs”), the Permittee shall develop a compound-specific emission factor, expressed in pounds of emissions per 100 pounds of solvent usage. Reportable SARA VOC emission factors shall be derived from data used to submit SARA reports. Each compound-specific fugitive emission factor for reportable SARA VOCs shall be updated and applied to monthly fugitive emission calculations beginning July 1 of each year.
    - (B) For VOC compounds not reported under SARA Title III, the Permittee shall use a generic fugitive emission factor, expressed in pounds of emissions per 100 pounds of solvent usage. The generic fugitive emission factor shall be equal to the highest representative emission factor developed in (A) above for a reportable SARA VOC used as a raw material in production processes. In the alternative, the Permittee may develop and apply a compound-specific emission factor for a compound not reported under SARA Title III. The generic fugitive emission factor and any compound-specific fugitive emission factor shall be updated and applied to monthly fugitive emission calculations beginning July 1 of each year.
  - (2) Emission calculation method: For VOCs with a compound-specific emission factor described in Conditions F.1.7(e)(1)(A) and (B), the Permittee shall calculate monthly fugitive VOC emissions by multiplying the compound-specific emission factor by the corresponding compound-specific monthly solvent usage. For VOCs without a compound-specific emission factor, the Permittee shall calculate monthly fugitive VOC emissions by multiplying the generic emission factor described in Condition F.1.7(e)(1)(B) by the monthly solvent usage of those compounds.

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

### **F.1.8 Records and Reporting of Emissions**

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- (a) The Permittee shall record and maintain records of all information necessary for estimating emissions including all measurements and calculations described in Conditions F.1.3 through F.1.7.
- (b) The Permittee shall submit a quarterly report of actual emissions of CO, fluorides, NO<sub>x</sub>, SO<sub>2</sub>, and VOC, as determined in accordance with Sections F.1.3 through F.1.7.

### **F.1.9 Change Management Evaluation Process**

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The Permittee shall employ a change management evaluation process to determine whether changes will affect compliance with the requirements of the Pharmaceutical MACT standards [40 CFR Part 63, Subpart GGG]. This change evaluation process shall include the following elements:

- (a) New processes, process changes, and physical changes to process equipment that increase hazardous air pollutant emissions from process vents, wastewater streams, and storage tanks will be considered “new process operating scenarios”. Changes which affect fugitive emissions equipment components will not be considered new operating scenarios and will be managed per the relevant provisions of the leak detection and repair program, which includes provisions addressing the addition of, and changes to, components.
- (b) Each new process operating scenario [as defined in Condition F.1.9(a)] will be reviewed to determine whether the change will affect compliance with the emission standards under the Pharmaceutical MACT requirements. Compliance with the following standards will be evaluated: process vent standards [40 CFR 63.1254]; storage tank standards [40 CFR 63.1253]; and wastewater streams [40 CFR 63.1256].
- (c) Documentation of the evaluation of each new process operating scenario will contain the following information:
  - (1) For new process vents, a statement regarding the method for complying with 40 CFR 63.1254. The statement shall include an analysis regarding the need for conducting a compliance demonstration.
  - (2) For new storage tanks, a statement regarding the method for complying with 40 CFR 63.1253. The statement shall include an analysis regarding the need for conducting a compliance demonstration.
  - (3) For new or changed wastewater streams, a statement regarding the method for complying with 40 CFR 63.1256. The statement shall include an analysis that shows whether the new or changed wastewater stream fits within an existing compliance demonstration, or whether another demonstration must be conducted.
- (d) If a new process-operating scenario will trigger applicable requirements not described in this permit or compliance with applicable requirements will be demonstrated by methodologies not described in this permit, this permit must be revised pursuant to 326 IAC 2-7-12.

### **F.1.10 Records and Reporting of Site Modifications [326 IAC 2-7-5(16)] [326 IAC 2-7-20(a)] [40 CFR 63.1259] [40 CFR 63.1260]**

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- (a) Changes made pursuant to advance approval provisions:

The Permittee shall record and maintain records of all modifications that would have otherwise required a revision to this permit pursuant to 326 IAC 2-7-12 or a source modification approval if the provisions of 326 IAC 2-7-10.5 were applicable.

- (b) Pharmaceutical MACT operating scenarios:
- (1) Pursuant to 40 CFR 63.1259(c), for all equipment subject to the pharmaceutical MACT requirements, the Permittee shall develop a record describing operating scenarios that may occur in the operating areas that are subject to pharmaceutical MACT requirements.
  - (2) Pursuant to 40 CFR 63.1260(f)(4), for all equipment subject to the pharmaceutical MACT requirements, the Permittee shall list all known operating scenarios that may occur in the operating areas that are subject to pharmaceutical MACT requirements in the notification of compliance status report.
  - (3) Pursuant to 40 CFR 63.1259(b)(8), for all equipment subject to the pharmaceutical MACT requirements, the Permittee shall maintain a log that records which operating scenarios have been put into effect in the operating areas that are subject to pharmaceutical MACT requirements.

F.1.11 Notifications for Site Modifications [326 IAC 2-1.1-12(c) to (f)]

- (a) The Permittee shall submit a notification for any modification that would have otherwise required a source modification approval if the provisions of 326 IAC 2-7-10.5 were applicable, to the address listed in Section C, Condition C.19 – General Reporting Requirements, at least ten (10) days before implementing the modification.
- (b) The notification shall include the following information:
- (1) The company name and address and source and permit identification numbers;
  - (2) A description of the physical or operational change, including an estimate of the potential to emit of the emissions associated with the change;
  - (3) An identification of the emission unit or units being changed on the layout diagram of the source;
  - (4) The schedule for constructing each physical change and implementing each operational change;
  - (5) Identification of any applicable requirements that are applicable to the physical or operational change and include any monitoring, record keeping, or reporting requirements;
  - (6) A statement for all regulated pollutants, except the pollutant for which the emissions limit has been established, that demonstrates that the physical or operational change will not trigger any federal or state permitting requirement for any regulated pollutant; and
  - (7) A statement that the physical or operational change will not result in emissions greater than the emission limits.
- (c) This notification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

#### F.1.12 Inclusion of Site Modifications in Pharmaceutical MACT Periodic Report

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- (a) Pursuant to 40 CFR 63.1260(g)(2)(vii), the Permittee shall include in the Periodic Report information for each new operating scenario operated since the time period covered by the last Periodic Report. These reports shall be submitted as required in the Record Keeping and Reporting Requirements of Section D.11.
- (b) Pursuant to 40 CFR 63.1260(h)(1), whenever a new process is introduced, or a change in any of the information submitted in the Notification of Compliance Status Report, the Permittee shall submit the following information with the next Periodic Report as required in the Record Keeping and Reporting Requirements of Section D.11:
  - (1) A brief description of the process change;
  - (2) A description of any modifications to standard procedures or quality assurance procedures;
  - (3) Revisions to any of the information reported in the original Notification of Compliance Status Report under 40 CFR 63.1260(f); and
  - (4) Information required by the Notification of Compliance Status Report under 40 CFR 63.1260(f) for changes involving the addition of processes or equipment.
- (c) Pursuant to 40 CFR 63.1260(h)(2), the Permittee must submit a report 60 days before the scheduled implementation date of either of the following:
  - (1) Any change in the activity covered by the Precompliance report.
  - (2) A change in the status of a control device from small to large.

#### F.1.13 Reports of Changes Affected by Hazardous Waste Combustor MACT

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- (a) Pursuant to 40 CFR 63.1206(b)(5)(iii), a change is defined as any change in design, operation or maintenance practices that were documented in the comprehensive performance test plan, Notification of Compliance, or startup, shutdown and malfunction plan.
- (b) For changes that may adversely affect compliance with emission limits for pollutants which are not monitored with a CEMS, the Permittee shall:
  - (1) Notify the Administrator at least 60 days prior to the change, unless circumstances are documented that dictate that such prior notice is not reasonably feasible.
  - (2) Conduct a comprehensive performance test under the requirements of 40 CFR 63.1207(f)(1) and (g)(1) to document compliance with the affected emission standard(s) and establish operating parameter limits as required under 40 CFR 63.1209, and submit the Administrator a Notification of Compliance under 40 CFR 63.1207(j) and 40 CFR 63.1210(d); and
  - (3) Not burn hazardous waste for more than a total of 720 hours after such change is made and prior to submitting the Notification of Compliance unless the Administrator provides a written approval to burn hazardous waste in the interim.
  - (4) For changes that will not affect compliance, the Permittee shall document the change in the operating record upon making such change. The Permittee shall revise as necessary the performance test plan, Documentation of Compliance, Notification of Compliance, and startup, shutdown and malfunction plan to reflect these changes.

## **Other Flexible Permit Requirements**

### **F.1.14 Valid Period for Best Available Control Technology [326 IAC 2-2-3(4)]**

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The modifications that occur under this permit qualify as a single, ongoing phase of construction and modification to Clinton Laboratories. The BACT requirements established in Sections D.8, D.9, D.11 and D.12 shall remain valid over the entire period of this permit. If the time between consecutive modifications exceeds 18 months, the Permittee shall demonstrate that the initial BACT determination incorporated into the permit is still valid or propose new BACT requirements. The Permittee may provide, in its application for renewal of the permit, that the initial BACT determination incorporated into the permit is still valid or propose new BACT requirements. Upon expiration of this permit, Major New Source Review (NSR) requirements (Prevention of Significant Deterioration and Nonattainment NSR) shall apply.

### **F.1.15 NSPS and NESHAP Pre-Construction Notification and Reviews**

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The provisions of this permit do not relieve the Permittee of the notification and pre-construction approval requirements found in 40 CFR 60.7, 40 CFR 61.07, 40 CFR 61.08, and 40 CFR 63.5. If the Permittee constructs, reconstructs, or modifies an affected facility in a manner that requires notification or pre-construction approval under 40 CFR 60.7, 40 CFR 61.07, 40 CFR 61.08, or 40 CFR 63.5, the Permittee shall comply with those requirements.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### Section D.1 – Utilities Operations Quarterly Coal Characteristics and Consumption Report

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South State Road 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009  
Facility: Coal-fired boiler (C31 BLR01)  
Parameter: SO<sub>2</sub> emissions  
Limit: 4.72 lb/MMBtu

Quarter: \_\_\_\_\_ Year: \_\_\_\_\_

Month	Average Sulfur Content (% Wt.)	Average Heating Value (Btu/lb)	Total Coal Consumption (tons)	Average SO <sub>2</sub> Emission Rate (lb/MMBtu)

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.





**PART 5: CMS Excursion Summary, If Applicable**

Regulated Entity	Operating Time (days)	CMS	Number of Excursions	% Excursion

**PART 6: CMS Excursion Details, If Applicable**

Control Device: \_\_\_\_\_  
 CMS/CEMS: \_\_\_\_\_  
 Operating Time: \_\_\_\_\_

Date	Duration (days)

**PART 7: Bypass Summary**

Regulated Entity	Date	Start Time	Building or Fume Stream	Duration (hrs)	SSM Event?

**PART 8: SSM Summary**

REGULATED SOURCE	DATE	DURATION (hours)	SSM EVENT TYPE	SSM PLAN FOLLOWED?	NOTES

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Section E – Leak Detection and Repair (LDAR) Program Streamlined LDAR Periodic Report

Source Name: Eli Lilly and Company, Clinton Laboratories  
 Source Address: 10500 South SR 63, Clinton, Indiana 47842  
 Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
 Part 70 Permit No.: T165-6462-00009

Period: \_\_\_\_\_ Year: \_\_\_\_\_

#### LDAR Report for Waste Components

Process Unit:  
 Equipment Type:  
 Service:

Monitoring Period	Number Tested	Number Leakers	Percent Leakers	Process Unit Shutdown Periods

Number of Components	Number Added	Number Removed

Process Unit:  
 Equipment Type:  
 Service:

Monitoring Period	Number Tested	Number Leakers	Percent Leakers	Process Unit Shutdown Periods

Number of Components	Number Added	Number Removed

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009

This form consists of 2 pages

This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of pollutants emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Permit Requirement (specify permit condition #)
Date of Deviation: _____ Duration of Deviation: _____
Number of Deviations: _____
Probable Cause of Deviation: _____
Response Steps Taken: _____
Permit Requirement (specify permit condition #)
Date of Deviation: _____ Duration of Deviation: _____
Number of Deviations: _____
Probable Cause of Deviation: _____
Response Steps Taken: _____
Permit Requirement (specify permit condition #)
Date of Deviation: _____ Duration of Deviation: _____
Number of Deviations: _____
Probable Cause of Deviation: _____
Response Steps Taken: _____

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) \_\_\_\_\_

Report (specify) \_\_\_\_\_

Notification (specify) \_\_\_\_\_

Affidavit (specify) \_\_\_\_\_

Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### Section F.1 – Change Management and Flexible Permit Requirements Quarterly Emission Limit Report

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009  
Facility: RTOs, TO3/TO4, and Support Operations Fugitives  
Parameter: Emission Limits for VOC, CO, NO<sub>x</sub>, SO<sub>2</sub>, and Fluorides  
Limit:

Pollutant	RTOs (tons/yr)	TO3/TO4 Incinerators (tons/yr)	Support Operations Fugitives (tons/yr)	TOTAL (tons/yr)
VOC	N/A	N/A	N/A	300
CO	N/A	N/A	N/A	300
NO <sub>x</sub>	300	350	N/A	650
SO <sub>2</sub>	75	200	N/A	275
Fluorides	3.5	5.5	N/A	9

The attached spreadsheet provides the monthly actual emissions for operating areas subject to flexible permit requirements. The information is used to determine the emission limits provided above. This emission summary report is:

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report (see next page)

Quarter: \_\_\_\_\_ Year: \_\_\_\_\_

Pollutant	Actual Emission Estimates, tons								
	Month 1	Previous 11 Months	12-Month Total	Month 2	Previous 11 Months	12-Month Total	Month 3	Previous 11 Months	12-Month Total
<b>RTOs</b>									
VOC, Point									
CO									
NO <sub>x</sub>									
SO <sub>2</sub>									
Fluorides									
<b>TO3/TO4 Liquid Waste Incinerators</b>									
VOC, Point									
CO									
NO <sub>x</sub>									
SO <sub>2</sub>									
Fluorides									
<b>Support Operations</b>									
VOC, Fugitive									
<b>Total</b>									
VOC (Point + Fugitive)									
CO									
NO <sub>x</sub>									
SO <sub>2</sub>									
Fluorides									

# Indiana Department of Environmental Management Office of Air Quality

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

### Source Background and Description

Source Name:	Eli Lilly and Company, Clinton Laboratories Facility
Source Location:	10500 South State Road 63, Clinton, Indiana 47842
County:	Vermillion
SIC Code:	2833, 2834, 2879
Operating Permit No.:	165-6462-00009
Operating Permit Issuance Date:	October 1, 2004
Significant Permit Modification No.:	165-22481-00009
Permit Reviewer:	ERG/YC

On September 28, 2007, the Office of Air Quality (OAQ) had a notice published in the Daily Clintonian, Clinton, Indiana, stating that Eli Lilly and Company, Clinton Laboratories Facility had applied for a Significant Permit Modification to a Part 70 Permit to operate a pharmaceutical manufacturing plant. 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.

On October 26, 2007, the Permittee submitted comments on the proposed Significant Permit Modification. The summary of the comments is as follows.

#### Comment 1:

On Page 2, in the "Table of Contents", the condition number for "Certification" should be B.8 instead of B.7.

On Page 2, in Condition C.1 in the "Table of Contents", the word "For" should be revised to "for".

If all the changes requested by Clinton Laboratories are accepted by IDEM, on Page 3, in the "Table of Contents", the page number for Section E should be 110 instead of 114, and the page number for Section F should be 120 instead of 124.

On Page 3, in the "Table of Contents" and on Page 115, the heading for Section E.1 should be revised from "Leak Detection and Repair (LDAR) Conditions" to "Leak Detection and Repair (LDAR) Conditions for BPM Process System Components".

If all the changes requested by Clinton Laboratories are accepted by IDEM, "Page x of 152" in the header on all pages would become "Page x of 147".

#### Response to Comment 1:

The Table of Contents and headers have been revised accordingly.

**Comment 2:**

On Page 4, in Section A.1, "1 of 28 Source Categories" should be revised to "1 of 26 Source Categories". 326 IAC 2-2-1(gg)(1) describes 26 source categories, and 326 IAC 2-7-1(22)(B) describes 27 source categories.

On Page 2 of the TSD, in Paragraph (d) of "County Attainment Status" and Paragraph (a) of "Source Status", "one of the twenty-eight (28) listed source categories" should be revised to "one of the twenty-six (26) listed source categories". 326 IAC 2-2-1(gg)(1) includes only 26 source categories.

On Page 2 of the TSD, in Paragraph (e) of "County Attainment Status", "one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3" should be revised to "one of the twenty-six (26) listed source categories under 326 IAC 2-2 or one of the twenty-seven (27) listed source categories under 326 IAC 2-3"

**Response to Comment 2:**

326 IAC 2-2-1(gg)(1)(J) includes three (3) source categories (hydrofluoric, sulfuric, and nitric acid plants). Therefore, it is considered that there are a total of 28 specific source categories listed under 326 IAC 2-2-1(gg)(1). No change has been made as a result of this comment.

**Comment 3:**

On Page 9, in Condition B.2, Lilly notes that IDEM proposed to add the language that appears in proposed paragraph (b). This language duplicates language that already appears in the permit in Condition B.16(b)(2). This duplication should be eliminated by deleting one of the two provisions. Lilly suggests deleting the proposed Condition B.2(b).

On Page 9, in Condition B.2.1(a), the words "pursuant to Title I of the Clean Air Act" should be deleted to keep the condition consistent with the language in 326 IAC 2-1.1-9.5.

**Response to Comment 3:**

Since the paragraphs in Condition B.2(b) and B.16(b)(2) are identical, IDEM agrees to remove Condition B.2(b) from the permit. Condition B.2 has been revised as follows as the result of this comment:

**B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

~~(a)~~ This permit, T165-6462-00009, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.

~~(b)~~ If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

Since the phrase "pursuant to Title I of the Clean Air Act" does not appear in 326 IAC 2-1.1-9.5, IDEM agrees to remove this phrase from Condition B.2.1(a). Condition B.2.1 has been revised as follows as the result of this comment:

**B.2.1 Term of Conditions [326 IAC 2-1.1-9.5]**

---

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

...

**Comment 4:**

On Page 11, in Condition B.10(a), the following additional language should be inserted after B.10(a)(3) to keep Condition B.10(a) consistent with the existing permit:

"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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)."

**Response to Comment 4:**

Since the language proposed was included in the most recent permit, Condition B.10(a) has been revised as follows:

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6 (1) and (6)] [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 facility:

...

**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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251**

**The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

...

**Comment 5:**

On Page 16, in Condition B.13, the phrase “under 326 IAC 2-7-10.5” in Conditions B.13(a)(2) and (a)(3) should be deleted, and the phrase “by this permit.” should be restored as it currently exists in the permit. IDEM has proposed this revision to the permit, but does not explain the basis for it in the Technical Support Document. The potential implications of this revision are not clear to Lilly. If revised as proposed by IDEM, the term may no longer reflect the actions taken on “all terms and conditions of permits established prior to T165-6462-00009”. The existing language in Condition B.13(a), however, does reflect the actions that Lilly believes occurred at the time the permit was issued.

**Response to Comment 5:**

IDEM has agreed to make the proposed changes to Condition B.13 to be consistent with the language contained in T165-6462-00009, issued on October 1, 2004. Therefore, Condition B.13 has been revised as follows:

**B.13** Prior Permits Superseded [326 IAC 2-1.1-9.5] ~~[326 IAC 2-7-10.5]~~

- (a) All terms and conditions of permits established prior to T165-6462-00009, issued October 1, 2004 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised ~~under 326 IAC 2-7-10.5~~, or
  - (3) ~~deleted under 326 IAC 2-7-10.5.~~
- by this permit.**

...

**Comment 6:**

On Page 16, in Condition B.14(a); and on Page 23, in Condition C.8(a), we believe that “MC 61-52” in the address should be revised to “MC 61-53”.

**Response to Comment 6:**

Conditions B.14(a) and C.8(a) have been corrected as follows:

**B.14** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) ...

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-5253, IGCN 1003  
Indianapolis, Indiana 46204-2251

...

**C.8** Performance Testing [326 IAC 3-6]

- (a) ...

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-5253, IGCN 1003  
Indianapolis, Indiana 46204-2251

...

**Comment 7:**

On Page 19, in Condition B.19(a)(3), the words "limitations provided in" should be deleted, and the existing words "emissions allowable under" retained. Leaving the wording as it currently exists is consistent with the regulatory language in 326 IAC 2-7-20(a)(2).

On Page 19, in Condition B.19(c), IDEM proposed to change the words "increases and decreases in emissions in the source" to "emissions increases and decreases at the source". This proposed change should not be made because the proposed words are inconsistent with the language in 326 IAC 2-7-20(c), while the existing language in the permit is consistent with the rule.

**Response to Comment 7:**

IDEM has agreed to make the proposed changes to Condition B.19 to be consistent with the language contained in T165-6462-00009, issued on October 1, 2004.

**B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

---

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

...

(3) The changes do not result in emissions which exceed the **emissions allowable under** ~~limitations provided in~~ this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

...

(c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade ~~emissions~~ increases and decreases **in emissions in at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

...

**Comment 8:**

On Page 26, in Condition C.11(g), the regulatory reference should be changed from "326 IAC 3-5-5(e)(1)" to "326 IAC 3-5-5(e)(2)" in both places.

**Response to Comment 8:**

Condition C.11 has been corrected as follows:

C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] [326

IAC 2-1.1-11] [326 IAC 3-5]

---

...

- (g) The Permittee shall prepare and submit to IDEM, OAQ a written report of the results of the quarterly cylinder gas audits and annual relative accuracy test audits within thirty (30) days after the end of each calendar quarter. The report must contain the information required by 326 IAC 3-5-5(e)~~(1)~~(2). 326 IAC 3-5-5(e)~~(1)~~(2) is not federally enforceable.

...

**Comment 9:**

On Page 26, in the heading for Condition C.12, “[326 IAC 3-5]” should be added as the basis for regulatory requirements in Condition C.12, to make it consistent with the “Table of Contents” on Page 3.

**Response to Comment 9:**

The heading for Condition C.12 has been corrected as follows:

C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] **[326 IAC 3-5]**

---

...

**Comment 10:**

On Page 30, in Condition C.18(c), the changes listed below should be made so that Condition C.18(c) correctly reflects the requirements of the PSD and Nonattainment NSR rules in 326 IAC 2-2 and 326 IAC 2-3. As currently proposed, the record keeping requirements in Condition C.18(c) greatly exceed what is required by rule. 326 IAC 2-2-8(b) and 326 IAC 2-3-2(m) require sources to keep records only when there is a “reasonable possibility” that a project will result in a significant increase in emissions. The proposed language in C.18(c) would require recordkeeping for virtually all changes at a site. In addition to exceeding regulatory authority, this proposed Condition would create administrative burdens on sources that greatly exceed any environmental or compliance benefit to the state of Indiana.

- “(c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in a significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:”

**Response to Comment 10:**

IDEM, OAQ agrees with the proposed changes and Condition C.18(c) has been revised as follows as the result of this comment:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]  
[326 IAC 2-3]

---

...

- (c) If there is a **reasonable possibility that** a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) **may result in a significant emissions increase** and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

...

**Comment 11:**

On Page 31, in Conditions C.19(f), C.19(g), and C.19(h), the following changes should be made to provide a better understanding of the requirements:

- “(f) If the Permittee is required to comply with the recordkeeping provisions of **Condition C.18(c)** in ~~Section C – General Record Keeping Requirements~~ for any “project” (as defined in **326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)**) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

- (1) The annual emissions, in tons per year, from the project identified in **Condition C.18(c)(1)** in ~~Section C – General Record Keeping Requirements~~ exceed the baseline actual emissions, as documented and maintained under ~~Section C – General Record Keeping Requirements~~ **Condition C.18(c)(1)(C)(i)**, by a significant amount, as defined in **326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq)**, for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under ~~Section C – General Record Keeping Requirements~~ **Condition C.18(c)(1)(C)(ii)**.

- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

...

- (2) The annual emissions calculated in accordance with **Conditions C.18(c)(2) and (3)** in ~~Section C – General Record Keeping Requirements~~.

...

Reports required in this ~~condition~~part shall be submitted to:

...

- (h) The Permittee shall make the information required to be documented and maintained in accordance with **Condition C.18(c)** in ~~Section C – General Record Keeping Requirements~~ available for review upon a request for inspection by **the Indiana Department of Environmental Management**. The general public may

request this information from the **Indiana Department of Environmental Management** under 326 IAC 17.1.”

**Response to Comment 11:**

IDEM agrees with Lilly and the conditions have been revised as proposed above.

**Comment 12:**

The Permittee stated that they had provided this comment earlier as part of Change Request 16 in our submittal dated March 26, 2007 regarding the Review Comments for Preliminary Draft Significant Permit Modification No. 165-22481-00009 and are providing it again.

On Page 32, Condition C.20 fails to address the applicability of all the regulatory requirements of 40 CFR Part 82, Subpart F to operations at Clinton Laboratories.

The Permittee is suggesting the following revisions to Condition C.20:

“Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the **applicable** standards for recycling and emissions reduction **contained in 40 CFR Part 82.**”

- (a) ~~Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- (b) ~~Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- (c) ~~Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.”~~

This language was accepted by IDEM in the Part 70 Operating Permit for the Lilly Technology Center [Permit #T097-6846-00072, issued October 31, 2006]. In addition, this language has been accepted in the Part 70 Operating Permit for Lilly’s Tippecanoe Laboratories [Permit # T157-6879-00006].

**Response to Comment 12:**

Since the proposed language has been accepted by other similar permits, Condition C.20 has been revised as suggested above.

**Comment 13:**

On Page 33, in the third row, fifth column of the table in Section D.1(a), the “Electrostatic Precipitator” should be replaced with “Baghouse”.

On Page 33, in the second row, second column of the table in Section D.1(b), an asterisk needs to be placed besides TK600 because it is an insignificant activity as defined in 326 IAC 2-7-1(21).

Also, on Page 33, in the second row, fifth column, “Baghouse” needs to be deleted as the control device.

The vent sock on the powdered activated carbon silo is not a baghouse and is not considered a control device. The vent sock must be operated in order to run the powdered activated carbon silo. The silo requires a means for displaced air to be released when the silo is filled with powdered activated carbon. The vent sock provides the mechanism for the displaced air to vent from the silo while capturing any powder that might be carried out in the turbulent air flow. It acts similar to a baghouse used to convey dry material from one location to another, but acts in a passive manner. If the vent sock were not present, large quantities of powdered activated carbon would escape – not just dust that would be suspended in the displaced air. It is therefore considered integral to the powdered activated carbon silo and not considered an air pollution control device, as defined in 326 IAC 1-2-3. As a result, the uncontrolled emissions or potential emissions for the powdered activated carbon silo take into account the emissions control achieved by the vent sock, and the powdered activated carbon silo qualifies as an insignificant activity as defined in 326 IAC 2-7-1(21).

**Response to Comment 13:**

Boiler C31 is currently controlled by a baghouse. This change has been included in the Proposed Change Section of the Technical Support Document.

Based on the information submitted on October 26, 2007 and January 10, 2008, IDEM has agreed that the vent sock associated with the new activated carbon silo (TK-600) is considered integral to the silo because the primary purpose for vent socks is product recovery, and not air pollution control. Without the vent socks in place, a significant amount of powdered activated carbon would escape from the silo. The Permittee estimated that the cost to operate the vent socks is \$1,496 per year and the cost for the lost product when operating without vent socks is \$59,858 per year. Therefore, the control device for this unit which was originally listed as a baghouse in the draft permit, will be removed from the final permit. The potential to emit from the activated carbon silo (TK-600) is less than the thresholds for insignificant activities as defined in 326 IAC 2-7-1 (22). Therefore, the description box in Section D.1 has been revised as follows:

**SECTION D.1 UTILITIES OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section.						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control Devices**	Capacity	Units
C31	Ash Tank	Ash Tank for C31 Coal Fired Boiler	PVC31ASH TK TRNSFR	Baghouse**	6,361	Cubic Feet
C31	BLR01	Coal Fired Boiler	PVC31ESP	Electrostatic Precipitator Baghouse**	243	MMBTU/hr
(b) The following emissions units are not subject to applicable requirements described in this D section, and are listed only for informational purposes.						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control Devices**	Capacity	Units
C31	TK600*	Powdered Activated Carbon Silo	FLT630	Baghouse	2,294	Cubic Feet

**Comment 14:**

On Page 34, after Condition D.1.4, the heading "Compliance Determination Requirements" should be revised to "Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]" to keep the format consistent throughout the permit. In addition, the heading should be moved after Condition D.1.5 (renumbered as D.1.4.1).

Accordingly, on Page 36, after Condition D.1.8(c), the heading "Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]" should be deleted.

On Page 34, Condition D.1.5 should be renumbered as Condition D.1.4.1. This will ensure that the other conditions in Section D.1 which have not been changed retain the numbers assigned to them in the existing Part 70 operating permit.

On Page 34, Condition D.1.5 [renumbered as D.1.4.1] should be revised as follows:

**"D.1.54.1 Particulate Matter Control**

- 
- (a) ~~—————~~ In order to comply with Ccondition D.1.1(a), the baghouse for particulate **matter** control shall be in operation and control emissions from the coal-fired boiler C31 at all times that this boiler is in operation. **For this condition, the boiler is considered to be operation when coal is being burned.**
- (b) ~~—————~~ In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification."

Condition D.1.5(b) should be deleted because we believe that the Emergency Provisions in Condition B.11, General Reporting Requirements in Condition C.19, and Reporting Requirements in Condition D.1.17 (renumbered as D.1.15) are adequate for reporting any issues regarding the operation of the baghouse.

Furthermore, IDEM has not stated its legal authority for this requirement. If Clinton Laboratories can operate the boiler and baghouse in compliance with applicable requirements such as particulate matter emission limits and opacity standards when a bag failure occurs because of the design or performance capabilities of the baghouse, then the facility will be in compliance with the permit, and no extra provisions are necessary.

**Response to Comment 14:**

The headings of "Compliance Determination Requirements" and "Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]" in Section D.1 are the standard headings IDEM apply for all the Part 70 permits. No change will be made to these headings.

IDEM agrees to renumber Condition D.1.5 as D.1.4.1 to keep the numbering system the same as the first Part 70 Permit (T165-6462-00009, issued on October 1, 2004). In addition, IDEM agrees to make the requested changes to Condition D.1.5(a) to state that the operation of baghouse is only required when coal is combusted in boiler C31.

The Permittee submitted additional information on January 10, 2007 which states that the baghouse associated with the coal-fired boiler has five (5) identical modules and the source

has successfully demonstrated during the PM emission test conducted on August 30, 2007 that compliance with the PM and opacity limits can be achieved with only four (4) modules being in operation. The Permittee stated that the baghouse is operated with only four (4) modules under normal operating conditions. Therefore, IDEM agrees to remove the requirements in Condition D.1.5(b).

Therefore, Condition D.1.5 has been revised as follows and the conditions after D.1.5 have been renumbered.

**D.1.54.1 Particulate Matter Control**

---

- (a) In order to comply with ~~condition~~ **Condition D.1.1(a)**, the baghouse for particulate **matter** control shall be in operation and control emissions from **the** coal-fired boiler C31 at all times that this boiler is in operation **and combusting coal as the fuel**.
- (b) ~~In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

**Comment 15:**

On Page 34, Condition D.1.6(a) [renumbered as D.1.5(a)] should be revised as follows:

~~“Within 180 days after initial start-up of the baghouse associated with boiler C31, t]The Permittee shall perform particulate matter performance tests for the coal-fired boiler (C31 BLR01) utilizing Methods 5 or 17 (40 CFR Part 60, Appendix A) for PM or other methods as approved by the Commissioner. The initial stack test(s) must be completed within 36 months after initial issuance of this permit and within 180 days after initial startup of the baghouse. These tests shall be repeated every third calendar year from the calendar year of the most recently completed stack test. The requirements for conducting performance tests are described in Section C, Condition C.8 – Performance Testing.”~~

**Response to Comment 15:**

The Permittee requested to document that the initial stack testing for boiler C31 was required to be performed before three years after the issuance of T165-6462-00009, issued on October 1, 2004. Therefore, Condition D.1.6(a) has been revised as shown above.

**Comment 16:**

On Pages 34 through 36, Conditions D.1.6 through D.1.10 should be renumbered as D.1.5 through D.1.9, respectively. On Pages 36 through 38, Conditions D.1.12 through D.1.18 should be renumbered as D.1.10 through D.1.16. Accordingly, on Page 38, in Condition D.1.17(a) [renumbered as D.1.15(a)], “Condition D.1.12” should be revised to “Condition D.1.10”.

**Response to Comment 16:**

IDEM agrees with the proposed changes. The conditions in Section D.1 have been renumbered.

**Comment 17:**

According to the comments submitted on October 26, 2007 and January 10, 2008, and the additional information submitted for the pressure drop range on November 5, 2007 and November 20, 2007, Condition D.1.10 (renumbered as D.1.9) should be revised as follows:

**D.1.940 Baghouse Parametric Monitoring**

The Permittee shall record the pressure drop across the baghouse used in conjunction with coal-fired boiler C31 at least once per day when the boiler is in operation. **For this condition, the boiler is considered to be in operation when coal is being burned.** When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and ~~6.0~~**10.0** inches of water ~~or a range established during the latest stack test,~~ the Permittee shall take reasonable response steps in accordance with **the Compliance Response Plan required by Condition C.15**~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~. A pressure **drop** reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with ~~the Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports,~~ shall be considered a deviation from this permit.

~~The instrument used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months. The span of the pressure drop monitor shall be less than 50 inches of water and it shall be operated in accordance with the vendor specifications and the Preventive Maintenance Plan required by Condition D.1.4.~~

Clinton Laboratories uses a continuous opacity monitoring system for monitoring the opacity from the coal-fired boiler exhaust stack, which is also a surrogate for monitoring the particulate matter emissions, and therefore acts as a surrogate for monitoring the operation of the baghouse. We therefore believe that extensive monitoring, recording, and quality assurance/quality control requirements on the continuous monitoring system used for monitoring the pressure drop across the baghouse are unnecessary.

**Response to Comment 17:**

Without the stack test results to establish the correlation between the PM emissions and the opacity readings, the COMS readings do not represent the PM emissions. Therefore, compliance with the PM emission limits shall be demonstrated by proper operation of the baghouses, which includes monitoring the pressure drop of the baghouse daily. Therefore, IDEM believes that Condition D.1.10 (now D.1.9) is necessary and shall remain in the permit. IDEM agrees to revise the language related to instrument calibration to the language proposed by the Permittee. For clarification purpose, Condition D.1.10 (now D.1.9) has been revised as follows:

**D.1.409 Parametric Monitoring**

The Permittee shall record the pressure drop across the baghouse used in conjunction with coal-fired boiler C31 at least once per day when the boiler is in operation **and combusting coal as fuel**. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and ~~6.0~~**10.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with ~~Section C~~ **Condition C.15** – Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with ~~Section C~~ **Condition**

**C.15 - Compliance Response Plan - Preparation, Implementation, Records, and Reports,** shall be considered a deviation from this permit.

~~The instrument used for determining the pressure shall comply with Section C—Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months. The span of the pressure drop monitor shall be less than 50 inches of water and the pressure drop gauge shall be calibrated annually.~~

**Comment 18:**

On Page 36, Condition D.1.11 should be deleted. The baghouse on the coal-fired boiler C31 has five modules (compartments) and is therefore not classified as a single compartment baghouse. Condition D.1.11, as written, is only applicable for single compartment baghouses.

**Response to Comment 18:**

Since the baghouse installed with boiler C31 is not a single compartment baghouse, Condition D.1.11 (now D.1.10) - Broken or Failed Bag Detection has been removed from the permit as follows. The conditions after D.1.10 in Section D.1 have been renumbered accordingly.

~~D.1.10 Broken or Failed Bag Detection~~

---

- ~~(a) — For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B—Emergency Provisions).~~
- ~~(b) — For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line (or emissions unit — choose the most appropriate). Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B—Emergency Provisions).~~

~~Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.~~

**Comment 19:**

On Page 37, Condition D.1.15 (renumbered as D.1.13) should be revised as follows:

**D.1.1345 Baghouse Record Keeping Requirements**

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- (a) — To document compliance with Condition D.1.13, the Permittee shall maintain daily records of the pressure drop reading for the baghouse associated with coal-fired boiler C31. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).

~~(b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

Condition D.1.15(b) is redundant with Condition C.18 and is unnecessary.

**Response to Comment 19:**

IDEM agrees to the changes proposed and Condition D.1.15 (now D.1.13) has been revised as shown above.

**Comment 20:**

On Page 39, in Section D.2, for the first row in the table, the “Heading Rows Repeat” option should be turned off, so as to avoid repeating the contents of the first row of the table on Pages 40 and 41.

**Response to Comment 20:**

The description box in Section D.2 has been modified as suggested as a result of this comment.

**Comment 21:**

On Page 47, in Condition D.3.2, the second paragraph should be revised from “Compliance with this VOC limit may be demonstrated using the CEM data based on an hourly rolling average or using the mass balance calculations based on the one-hour block average” to “The Permittee shall demonstrate compliance with the VOC emissions limit either on an hourly rolling average basis or on one-hour block average basis.”

We agree that as stated in our July 9, 2007 submittal, the methods described in the second paragraph in Condition D.3.2 are the ones that are currently followed by Clinton Laboratories to demonstrate compliance. However, Condition D.3.2 as written would unnecessarily restrict Clinton Laboratories to either use the continuous emissions monitor (CEM) data or use the mass balance calculations to demonstrate compliance. Condition D.3.7 already allows a much broader use of mass balance calculations, or direct measurement (e.g., flame ionization detector) for determining outlet emissions from the carbon adsorber CA460.

**Response to Comment 21:**

IDEM agrees with the proposed change and Condition D.3.2 has been revised as requested.

**Comment 22:**

On Page 53, in Rows 4 through 6 of the table, “Baghouse VS005-B” should be revised to “Baghouse VS005B” to ensure consistency.

The change was also requested as part of Change Request 19 of the March 26, 2007 submittal.

Clinton Laboratories recently decided that it was no longer going to use Emission Units CY002 (Cyclone Separator) and VS002 (Transfer Baghouse) in Product Finishing Operations. Even though this equipment may physically exist on site in the future, they will no longer be used. If they need to be used in the future, they will go through an air permitting analysis and added to the Title V operating permit as necessary. Accordingly,

on Pages 50 and 51 respectively, CY002 and VS002 should be deleted from the table in Section D.4(a).

**Response to Comment 22:**

The description box of Section D.4 has been revised as follows as a result of these comments:

**SECTION D.4 AHM – PRODUCT FINISHING OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
...						
C47	CY002*	CYCLONE SEPARATOR	PVC58AC190	Baghouse VS2, Carbon Adsorber CA190**	N/A	N/A
...						
C47	VS002	TRANSFER BAGHOUSE	PVC58AC190	Carbon Adsorber CA190**	N/A	N/A
...						
(b) The following emissions units are not subject to applicable requirements, and are listed only for informational purposes.						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
...						
C47	SM210A*	RIBBON MIXER	PVC47AC005B	Baghouse VS005-B	N/A	N/A
C47	SM210B*	RIBBON MIXER	PVC47AC005B	Baghouse VS005-B	N/A	N/A
C47	SS250*	SCREENERS	PVC47AC005B	Baghouse VS005-B	N/A	N/A
...						

**Comment 23:**

On Page 55, in Condition D.4.7, the word “compliance” should be changed to “Compliance” to ensure consistency.

**Response to Comment 23:**

Condition D.4.7 has been revised as follows as the result of this comment:

**D.4.7 Visible Emissions Observations [326 IAC 2-1.1-11]**

The Permittee shall visually observe the emissions from TK103 exhaust while it is operating at least once per day. TK103 is considered to be operating only when raw materials are being unloaded into the tank. If abnormal emissions are observed, the Permittee shall follow the ~~compliance~~ **Compliance** Response Plan as required by Condition C.15.

**Comment 24:**

Change Request 45 of the December 21, 2005 submittal and Change Request 21 of the March 26, 2007 submittal requested IDEM to delete the entire descriptive information from the Facility Description in Section D.5 and replace it with the following:

“The following information is descriptive information and does not constitute enforceable conditions:

The Permittee decided to permanently shut down the emission units that were listed in this section of the Part 70 operating permit that was issued on October 1, 2004. None of the emission units listed earlier in this section has been in actual operation at any time after October 1, 2004. Many of those emission units still physically exist on-site; however, all of those emission units are designated for demolition. The applicable requirements described or referred to in this D section apply to the BPM production operations and emission units that were described in this section of the October 1, 2004 version of the Part 70 operating permit.”

In the September 28, 2007 version of the permit, IDEM has still not deleted the table included in the October 1, 2004 Title V operating permit. We believe that retaining the equipment list in Section D.5 is unnecessary at this time because it will require us to request another revision to the Title V operating permit when the equipment is actually demolished. We are therefore requesting IDEM to delete the equipment list on Pages 57 through 59 and change the descriptive information in the Facility Description on Page 57 in accordance with Change Request 45 of the December 21, 2005 submittal and Change Request 21 of the March 26, 2007 submittal.

**Response to Comment 24:**

Since Section D.5 still contains recordkeeping requirements for the BPM production operations, the unit description box for the BPM operations will remain in the permit. The unit description box already contains a statement which states that the emission units listed in Section D.5 have been shut down permanently. Therefore, no change has been made as a result of this comment.

**Comment 25:**

On Page 59, the format for inclusion of Conditions D.5.1 through D.5.6 should be revised as follows in accordance with Change Request 46 of the December 21, 2005 submittal and Change Request 22 of the March 26, 2007 submittal:

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

D.5.1 ~~through D.5.5 Reserved~~ Standards for BPM Process Vents [40 CFR 63.1254, 326 IAC 2-2-3, and 326 IAC 8-5-3]

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**Reserved**

D.5.2 ~~Control Strategy for BPM Production Equipment Exhaust Systems [40 CFR 63.1254, 326 IAC 2-2-3, and 326 IAC 8-5-3]~~

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**Reserved**

D.5.3 ~~Leak Detection and Repair (LDAR) Standards [326 IAC 2-2-3, 326 IAC 8-5-3 and 40 CFR 63.1255]~~

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**Reserved**

~~D.5.4 Heat Exchange System Requirements [326 IAC 2-2-3 and 40 CFR 63.1252(c)(2)]~~

~~Reserved~~

~~D.5.5 Startup, Shutdown and Malfunction Requirements [326 IAC 2-2-3, 40 CFR 63.1259(a)(3), and 40 CFR 63.6(e) and 63.8(e)]~~

~~Reserved~~

~~Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.5.6 Testing and Monitoring Requirements~~

~~Reserved~~

**Response to Comment 25:**

The conditions in Section D.5 have been revised as above.

**Comment 26:**

On Page 59, Condition D.5.7(a) should be revised as follows to maintain consistency with other sections of the Title V operating permit:

~~D.5.7 Record Keeping Requirements~~

~~(a) Record Keeping Requirements~~

- ~~(1) **Reserved RTO Control System Records - The record keeping requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.**~~

~~...~~

- ~~(4) **Reserved LDAR Records - The record keeping requirements for the LDAR standards are described in Sections E.1 and E.2 of this permit.**~~

~~...~~

**Response to Comment 26:**

Condition D.5.7 has been revised as above.

**Comment 27:**

Change Request 52 of the December 21, 2005 submittal and Change Request 25 of the March 26, 2007 submittal requested IDEM to delete the entire descriptive information from the Facility Description in Section D.6 and replace it with the following:

"The following information is descriptive information and does not constitute enforceable conditions:

The Permittee decided to permanently shut down the emission units that were listed in this section of the Part 70 operating permit that was issued on October 1, 2004. None of the emission units listed earlier in this section has been in actual operation at any time after October 1, 2004. Many of those emission units still physically exist on-site; however, all of those emission units are designated for demolition. The applicable

requirements described or referred to in this D section apply to the solvent recovery operations and emission units that were described in this section of the October 1, 2004 version of the Part 70 operating permit.”

In the September 28, 2007 version of the permit, IDEM has still not deleted the table included in the October 1, 2004 Title V operating permit. We believe that retaining the equipment list in Section D.6 is unnecessary at this time because it will require us to request another revision to the Title V operating permit when the equipment is actually demolished. We are therefore requesting IDEM to delete the equipment list on Pages 61 and 62 and change the descriptive information in the Facility Description on Page 61 in accordance with Change Request 52 of the December 21, 2005 submittal and Change Request 25 of the March 26, 2007 submittal.

**Response to Comment 27:**

See the response to Comment 24. No change has been made as a result of this comment.

**Comment 28:**

On Page 62, the format for inclusion of Conditions D.6.1 through D.6.6 should be revised as follows in accordance with Change Request 53 of the December 21, 2005 submittal and Change Request 26 of the March 26, 2007 submittal:

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

D.6.1 ~~through D.6.5 Reserved~~ Standards for BPM Process Vents [40 CFR 63.1254, CFR 63.690, 326 IAC 2-2-3, and 326 IAC 8-5-3]

~~Reserved~~

D.6.2 ~~Treatment Unit Requirements [326 IAC 2-2-3 and 40 CFR 63.684]~~

~~Reserved~~

D.6.3 ~~Leak Detection and Repair (LDAR) for Fugitive Emissions [326 IAC 2-2-3 and 40 CFR 63.1255]~~

~~Reserved~~

D.6.4 ~~Heat Exchange System Requirements [326 IAC 2-2-3 and 40 CFR 63.1252(c)(2)]~~

~~Reserved~~

D.6.5 ~~Startup, Shutdown and Malfunction Requirements [326 IAC 2-2-3, 40 CFR 63.1259(a)(3), 40 CFR 63.697(b)(3), and 40 CFR 63.6(e)(3) and 63.8(c)]~~

~~Reserved~~

**Testing and Monitoring Requirements ~~[326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~**

D.6.6 ~~Testing and Monitoring Requirements~~

~~Reserved”~~

**Response to Comment 28:**

Conditions in Section D.6 have been revised as above.

**Comment 29:**

In accordance with Change Request 27 of the March 26, 2007 submittal, on Page 62, the words "and Reporting" should be deleted from the title for Condition D.6.7, because the reporting requirements for emission units in Section D.6 are no longer applicable.

**Response to Comment 29:**

Condition D.6.7 has been revised as follows as the result of this comment:

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

**D.6.7 Record Keeping and Reporting Requirements**

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...

**Comment 30:**

In accordance with Change Request 60 of the December 21, 2005 submittal, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already deleted the table in Facility Description in Section D.7. In addition, in Change Request 29 of the March 26, 2007 submittal, we had requested that the descriptive information be revised in accordance with Change Request 60 of the December 21, 2005 submittal. However, in the September 28, 2007 version of the permit, IDEM has reinserted the table and not change the descriptive information as requested.

We are therefore requesting IDEM to delete the equipment list on Pages 64 through 66 and change the descriptive information in the Facility Description on Page 64 in accordance with Change Request 60 of the December 21, 2005 submittal and Change Request 29 of the March 26, 2007 submittal.

"The following information is descriptive information and does not constitute enforceable conditions:

The Permittee decided to permanently shut down the emission units that were listed in this section of the Part 70 operating permit that was issued on October 1, 2004. Only a few of the emission units listed earlier in this section had been in actual operation for some time after October 1, 2004. Many of those emission units still physically exist on-site; however, all of those emission units are designated for demolition. The applicable requirements described or referred to in this D section apply to the solvent storage tank operations and emission units that were described in this section of the October 1, 2004 version of the Part 70 operating permit."

**Response to Comment 30:**

See the response to Comment 24. No change has been made as a result of this comment.

**Comment 31:**

On Page 66, the format for inclusion of Conditions D.7.1 through D.7.5 should be revised as follows in accordance with Change Request 61 of the December 21, 2005 submittal and Change Request 30 of the March 26, 2007 submittal:

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

**D.7.1 through D.7.4 Reserved Standards for BPM Solvent Storage Tanks [40 CFR 63.1253(c)(1)(i), 40 CFR 60.112b and 60.113b, 326 IAC 8-5-3, and 326 IAC 2-2]**

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**Reserved**

~~D.7.2 — Exceptions to Standards for BPM Solvent Storage Tanks [40 CFR 63.1253 and 326 IAC 2-2]~~  
~~Reserved~~

~~D.7.3 — Leak Detection and Repair (LDAR) Standards [40 CFR 63.1255 and 326 IAC 2-2]~~  
~~Reserved~~

~~D.7.4 — Startup, Shutdown and Malfunction Requirements [40 CFR 63.1259(a)(3), 326 IAC 2-2-3,  
40 CFR 63.6(e) and 40 CFR 63.8(c)]~~  
~~Reserved~~

**Testing and Monitoring Requirements ~~[326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~**

~~D.7.5 Testing and Monitoring Requirements~~  
~~Reserved~~

**Response to Comment 31:**

Conditions in Section D.7 have been revised as suggested.

**Comment 32:**

On Page 66, the words “, of information and data related to Conditions D.7.1 and D.7.2 of the October 1, 2004 version of the Part 70 operating permit” should be added at the end of Condition D.7.6(a)(2).

On Page 67, in Condition D.7.6(a)(5), the words “shall(until” should be revised as “shall until”.

**Response to Comment 32:**

Condition D.7.6(a) has been revised as follows as the result of these comments:

**D.7.6 Record Keeping Requirements**

(a) Record Keeping Requirements

...

(2) Inspection and Maintenance Records - The Permittee shall maintain the following records from October 1, 2004 to the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers, **of information and data related to Conditions D.7.1 and D.7.2 in T165-6462-00009, issued on October 1, 2004:**

...

(5) Storage Tank Records – Pursuant to New Source Performance Standard for Volatile Organic Liquid Storage Vessels [40 CFR 60.116b(a) and (b)], the Permittee ~~shall(until~~ **shall until** the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers, keep readily accessible records of the dimensions and capacity for each BPM solvent storage tank.

...

**Comment 33:**

In accordance with Change Request 69 of the December 21, 2005 submittal and Change Request 34 of the March 29, 2007 submittal, waste tanks C3-TK-245, C63-TK-30, C63-TK-31, C63-TK-32, C63-TK-33, C64B-TK-13, and C64F-TK-1 should be deleted from the Facility Description in Section D.8 on Page 68. These waste tanks are no longer operating.

**Response to Comment 33:**

The description box in Section D.8 has been revised as follows as the result of this comment:

**SECTION D.8 SUPPORT OPERATIONS – WASTE TANK CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
<i>Building C3:</i>				
C3-TK-245	Waste Tank	PVC70A/BSCBR1/2	4,000-gal	RTO
<i>Building C63:</i>				
C63-TK-30	Waste Tank	PVC70A/BSCBR1/2	1,600-gal	RTO
C63-TK-31	Waste Tank	PVC70A/BSCBR1/2	1,600-gal	RTO
C63-TK-32	Waste Tank	PVC70A/BSCBR1/2	2,000-gal	RTO
C63-TK-33	Waste Tank	PVC70A/BSCBR1/2	2,000-gal	RTO
<i>C64 Tank Modules:</i>				
C64B-TK-13	Waste Tank	PVC64BTK013	30-gal	RTO
C64F-TK-1	Waste Tank	PVC64FTK001	58-gal	RTO
...				

**Comment 34:**

On Page 68, in Condition D.8.1, the word “and” should be inserted before “326 IAC 2-2-3” in the heading.

**Response to Comment 34:**

Condition D.8.1 has been revised as follows as the result of this comment:

D.8.1 Standards for Waste Storage Tanks [40 CFR 63.1256(b), 40 CFR 63.685, 40 CFR 60.110b, **and** 326 IAC 2-2-3]

...

**Comment 35:**

In accordance with Change Request 83 of the December 21, 2005 submittal, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already deleted the table in Facility Description in Section D.10. In addition, in Change Request 40 of the March 26,

2007 submittal, we had requested that the descriptive information be revised in accordance with Change Request 83 of the December 21, 2005 submittal. However, in the September 28, 2007 version of the permit, IDEM has reinserted the table and not changed the descriptive information as requested.

We are therefore requesting IDEM to delete the equipment list on Page 78 and change the descriptive information in the Facility Description on Page 78 in accordance with Change Request 83 of the December 21, 2005 submittal and Change Request 40 of the March 26, 2007 submittal.

“The following information is descriptive information and does not constitute enforceable conditions:

The Permittee decided to permanently shut down the emission unit that was listed in this section of the Part 70 operating permit that was issued on October 1, 2004. The emission unit listed earlier in this section has not been in actual operation at any time after October 1, 2004. The emission unit still physically exists on-site; however, the emission unit is designated for demolition. The applicable requirements described or referred to in this D section apply to the individual drain systems and emission units that were described in this section of the October 1, 2004 version of the Part 70 operating permit.”

**Response to Comment 35:**

See the response to Comment 24. No change has been made as a result of this comment.

**Comment 36:**

On Page 78, the format for inclusion of Conditions D.10.1 through D.10.3 should be revised as follows in accordance with Change Request 84 of the December 21, 2005 submittal and Change Request 41 of the March 26, 2007 submittal:

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

D.10.1 ~~through D.10.2 Reserved~~ ~~BPM Individual Drain System (IDS) Standards [40 CFR 63.1256(e), 40 CFR 63.689(b), and 326 IAC 2-2-3]~~

~~Reserved~~

D.10.2 ~~Startup, Shutdown and Malfunction Requirements [40 CFR 63.1259(a)(3), 40 CFR 63.697(b)(3), 326 IAC 2-2-3, 40 CFR 63.6(e) and 40 CFR 63.8(c)]~~

~~Reserved~~

**Testing and Monitoring Requirements ~~[326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~**

D.10.3 ~~Testing and Monitoring Requirements~~

~~Reserved”~~

**Response to Comment 36:**

Conditions in Section D.10 have been revised as suggested above.

**Comment 37:**

On Page 82, in the heading for Condition D.11.2, the word “and” should be inserted before “326 IAC 2-2-3”.

**Response to Comment 37:**

Condition D.11.2 has been revised as follows as the result of this comment:

D.11.2 Exceptions to RTO Control System Standards [40 CFR 63.1260(g), 40 CFR 63.6(e)(3) and 63.8(c), 40 CFR 63.681, 63.685(g) and 63.693(b), **and** 326 IAC 2-2-3]

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...

**Comment 38:**

In its December 21, 2005 submittal, Clinton Laboratories had submitted the following change requests:

- “102. On Page 112, in Condition D.12.8(a), the words “Except as allowed under (c) of this condition” should be replaced with “Except as allowed under (c) and (f) of this condition”.
- 103. On Page 113, in Condition D.12.8(d), the words “Except as allowed under (f) of this condition.” should be added at the beginning of the condition.
- 104. On Page 113, in Condition D.12.8, an additional Condition D.12.8(f) should be added after Condition D.12.8(e) as follows:

“(f) The following exceptions are allowed for the operation of the AWFCO system as specified in Condition D.12.8(a):

- (1) If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), the Permittee may exceed the operating parameter limit for primary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the secondary waste feed.
- (2) If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), the Permittee may exceed the operating parameter limit for secondary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the primary waste feed.”

In accordance with these requests, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already included the requested changes. However, in the September 28, 2007 version of the permit, IDEM has not incorporated the changes requested as part of Change Requests 102 through 104 of the December 21, 2005 submittal. Clinton Laboratories is requesting that the above requested changes be made on Pages 93 and 94 to Condition D.12.8.

**Response to Comment 38:**

Since there are two (2) set of operating parameters established for the primary waste and the secondary waste, IDEM has agreed to add the proposed exception language for the AWFCO system into the permit as Condition D.12.8(f). Condition D.12.8 has been revised as follows as the result of this comment:

D.12.8 Automatic Waste Feed Cutoff System Requirements [40 CFR 63.1206]

In order to satisfy the HWC MACT standards [40 CFR 63.1206], the Permittee shall operate the TO3/TO4 liquid waste incinerators with a functioning Automatic Waste Feed Cutoff (AWFCO) system that meets the requirements of 40 CFR 63.1206(c)(3).

- (a) Except as allowed under (c) **and (f)** of this condition, the AWFCO system shall be operated such that it immediately and automatically cuts off the hazardous waste feed when any of the following occur at any time:

...

- (d) **Except as allowed under (f) of this condition, after** After an AWFCO event, the Permittee shall not restart the hazardous waste feed until the operating parameters and emission levels are within their respective limits.

...

- (f) **The following exceptions are allowed for the operation of the AWFCO system as specified in Condition D.12.8(a):**

- (1) **If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), the Permittee may exceed the operating parameter limit for primary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the secondary waste feed.**
- (2) **If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), the Permittee may exceed the operating parameter limit for secondary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the primary waste feed.**

**Comment 39:**

In its December 21, 2005 submittal, Clinton Laboratories had submitted the following change request:

- "109. On Pages 115 and 116, the second paragraph in Condition D.12.14(a)(10) should be revised as follows:

~~"If additional performance testing is required for the TO3 liquid waste incinerator based on final determination by the U.S. EPA Region 5 on the Permittee's request to waive the initial comprehensive performance test for the TO3 liquid waste incinerator, the Permittee may choose to comply with the new operating requirements for the TO3 and TO4 liquid waste incinerators based on the results of the unit-specific initial comprehensive additional performance testing. Alternatively, the Permittee may choose to comply with the more stringent of the operating requirements for both incinerators based on the results of the initial comprehensive performance tests for **TO3 and TO4** liquid waste incinerators and additional performance testing for TO3 liquid waste incinerator."~~

In accordance with this request, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already included the requested changes. However, in the September 28, 2007 version of the permit, IDEM has not incorporated the changes requested as part of Change Request 109 of the December 21, 2005 submittal. Clinton Laboratories is

requesting that the above requested changes be made on Page 96 to the second paragraph of Condition D.12.14(a)(10)(B).

**Response to Comment 39:**

Since the Notice of Compliance for TO4, which includes the operating parameters for TO4 was approved by IDEM on August 30, 2007, the operating parameters for TO4 will be included in the final permit. In addition, EPA did not waive the initial comprehensive performance test for TO3. Therefore, Condition D.12.14(a)(10)(B) has been revised as described above.

**Comment 40:**

In its December 21, 2005 submittal, Clinton Laboratories had submitted the following change request:

“113. On Page 117, Condition D.12.16(a) should be revised as follows:

**“Except as stated in Conditions D.12.16(a)(1)(C), D.12.16(a)(1)(D) and D.12.16(a)(2)(B),** ~~t~~**The Permittee shall operate the following CMSs in accordance with the quality assurance requirements specified in 40 CFR 63.1209(d) at all times the TO3/TO4 incinerators are in operation. To satisfy the HWC MACT standards [40 CFR 63.1209(b), (d), (e), (f), and (h)] and the requirements for PSD sources [326 IAC 2-1.1-11] the following parameters, **except as stated in Conditions D.12.16(a)(1)(C), D.12.16(a)(1)(D) and D.12.16(a)(2)(B),** shall be monitored at all times the TO3/TO4 incinerators are in operation. In addition, **except as stated in Conditions D.12.16(e), (f), and (g),** the operating parameters monitored by the following CMSs shall not exceed the established operating parameter limits at all times incinerators are burning waste.”**

In accordance with this request, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already included the requested changes. However, in the September 28, 2007 version of the permit, IDEM has not incorporated some of the changes requested as part of Change Request 113 of the December 21, 2005 submittal. Clinton Laboratories is requesting that the following changes be made on Page 98 to Condition D.12.16(a):

**“Except as stated in Conditions D.12.16(a)(1)(C), D.12.16(a)(1)(D) and D.12.16(a)(2)(B),** ~~t~~**The Permittee shall operate the following CMSs in accordance with the quality assurance requirements specified in 40 CFR 63.1209(d) at all times the TO3/TO4 incinerators are in operation. To satisfy the HWC MACT standards [40 CFR 63.1209(b), (d), (e), (f), and (h)] and the requirements for PSD sources [326 IAC 2-1.1-11] the following parameters, **except as stated in Conditions D.12.16(a)(1)(C), D.12.16(a)(1)(D) and D.12.16(a)(2)(B),** shall be monitored at all times the TO3/TO4 incinerators are in operation. In addition, **except as stated in Conditions D.12.16(e), (f), and (g),** the operating parameters monitored by the following CMSs shall not exceed the established operating parameter limits at all times incinerators are burning waste.”**

On Page 98, in Condition D.12.16(a)(1), the “1” appears twice instead of once, which needs to be corrected.

In Change Request 114.c of the December 21, 2005 submittal, Clinton Laboratories had requested that the following should be added at the end of the sentence in Condition D.12.16(a)(1)(C):

**“If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), operation of the primary waste feed rate CMS is not required and the Permittee may use a value of 0 lb/hr for primary waste feed rate, or**

**the Permittee may continue to use the valid primary waste feed rate values being monitored and recorded by the primary waste feed rate CMS, for calculating the hourly and 12-hour rolling average values for relevant operating parameters.**

In Change Request 114.d of the December 21, 2005 submittal, Clinton Laboratories had requested that the following should be added at the end of the sentence in Condition D.12.16(a)(1)(D):

**“If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), operation of the secondary waste feed rate CMS is not required and the Permittee may use a value of 0 lb/hr for secondary waste feed rate, or the Permittee may continue to use the valid secondary waste feed rate values being monitored and recorded by the secondary waste feed rate CMS, for calculating the hourly and 12-hour rolling average values for relevant operating parameters.”**

In Change Request 114.e of the December 21, 2005 submittal, Clinton Laboratories had requested that Condition D.12.16(a)(2)(B) should be revised as follows:

“Minimum hourly rolling average **primary and secondary** atomizing media pressures, established based on manufacturer’s recommendations.”

Following two paragraphs should be added:

**“If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), operation of the primary waste atomizing media pressure CMS is not required and the Permittee may freeze the hourly rolling average calculation when primary waste is not being burned, or the Permittee may continue to use the valid primary waste atomizing media pressure values being monitored and recorded by the primary waste atomizing media pressure CMS, for calculating the hourly rolling average values.**

**If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), operation of the secondary waste atomizing media pressure CMS is not required and the Permittee may freeze the hourly rolling average calculation when secondary waste is not being burned, or the Permittee may continue to use the valid secondary waste atomizing media pressure values being monitored and recorded by the secondary waste atomizing media pressure CMS, for calculating the hourly rolling average values.”**

In Change Request 114.o of the December 21, 2005 submittal, Clinton Laboratories had requested that Condition D.12.16(a)(3)(E) should be revised as follows:

“(E) **Those parameters identified in Condition D.12.16(a)(1)(B) Flue Gas Flow Rate**  
~~–Maximum hourly rolling average flue gas flow rate established from the average of the maximum hourly rolling average for each performance test run.”~~

In accordance with these requests, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already included the requested changes. However, in the September 28, 2007 version of the permit, IDEM has not incorporated the changes requested as part of Change Requests 114.c, 114.d, and 114.e of the December 21, 2005 submittal. In addition, Condition D.12.16(a)(3)(E) has been deleted altogether.

In Change Request 53 of its March 26, 2007 submittal, Clinton Laboratories had requested several changes to Condition D.12.16(a) for incorporating the operating permit limitations for the TO4 liquid waste incinerator. However, in the September 28, 2007 version of the

permit, IDEM has not incorporated the changes requested as part of Change Request 53 of the March 26, 2007 submittal. On August 30, 2007, IDEM sent a letter to Clinton Laboratories regarding the approval of the Revised Notice of Compliance for TO4 liquid waste incinerator. The letter states that "Approval of the NOC and associated requirements must be incorporated into the Eli Lilly and Company's Clinton Laboratories' Title 5 permit. Please submit a permit modification request within sixty (60) days of the receipt of this acknowledgement."

On Page 101, in Condition D.12.16(a)(5)(B), the "s" in the word "rates" is shown in a strikethrough font, and should be deleted.

In addition, on Page 103, in Condition D.12.16(a)(5)(J), "condenser/absorber" should be changed to "polishing scrubber" and "0.0561" should be changed to "0.0124".

Accordingly, on Pages 98 through 103, in Condition D.12.16(a), the following changes shall be incorporated:

- (1) Dioxin/Furan CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(k)], the Permittee shall install and operate CMS monitors for the following parameters:
  - (A) Combustion Chamber Temperature - Minimum hourly rolling average combustion chamber temperature established from the average temperature measured during the three DRE test runs.
    - (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average combustion chamber temperature shall not be lower than 1,906 °F.
    - (ii) **For TO4 liquid waste incinerator, the hourly rolling average combustion chamber temperature shall not be lower than 1,957 °F.**
  - (B) Flue Gas Flow Rate - Maximum hourly rolling average flue gas flow rate established from the average of the maximum hourly rolling average for each performance test run.
    - (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average flue gas flow rate shall not exceed 16,046 standard cubic feet per minute, on a wet basis.
    - (ii) **For TO4 liquid waste incinerator, the hourly rolling average flue gas flow rate shall not exceed 15,996 standard cubic feet per minute, on a wet basis.**
  - (C) Primary Waste Feed Rate - Maximum hourly rolling average primary waste feed rate as established from the average of the maximum hourly rolling average for each performance test run.

**If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), operation of the primary waste feed rate CMS is not required and the Permittee may use a value of 0 lb/hr for primary waste feed rate, or the Permittee may continue to use the valid primary waste feed rate values being monitored and recorded by the primary waste feed rate CMS, for**

**calculating the hourly and 12-hour rolling average values for relevant operating parameters.**

(i) For TO3 liquid waste incinerator, the hourly rolling average primary waste feed rate shall not exceed 6,030 pounds per hour.

(ii) **For TO4 liquid waste incinerator, the hourly rolling average primary waste feed rate shall not exceed 5,975 pounds per hour.**

(D) Secondary Waste Feed Rate - Maximum hourly rolling average secondary waste feed rate as established from the average of the maximum hourly rolling average for each performance test run.

**If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), operation of the secondary waste feed rate CMS is not required and the Permittee may use a value of 0 lb/hr for secondary waste feed rate, or the Permittee may continue to use the valid secondary waste feed rate values being monitored and recorded by the secondary waste feed rate CMS, for calculating the hourly and 12-hour rolling average values for relevant operating parameters.**

(i) For TO3 liquid waste incinerator, the hourly rolling average secondary waste feed rate shall not exceed 17,001 pounds per hour.

(ii) **For TO4 liquid waste incinerator, the hourly rolling average secondary waste feed rate shall not exceed 16,597 pounds per hour.**

(2) DRE Standard CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(j)], the Permittee shall install and operate CMS monitors for the following parameters:

(A) Those parameters identified in Condition D.12.16(a)(1).

(B) Minimum hourly rolling average **primary and secondary** atomizing media pressures, established based on manufacturer's recommendations.

**If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), operation of the primary waste atomizing media pressure CMS is not required and the Permittee may freeze the hourly rolling average calculation when primary waste is not being burned, or the Permittee may continue to use the valid primary waste atomizing media pressure values being monitored and recorded by the primary waste atomizing media pressure CMS, for calculating the hourly rolling average values.**

**If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), operation of the secondary waste atomizing media pressure CMS is not required and the Permittee may freeze the hourly rolling average**

**calculation when secondary waste is not being burned, or the Permittee may continue to use the valid secondary waste atomizing media pressure values being monitored and recorded by the secondary waste atomizing media pressure CMS, for calculating the hourly rolling average values.**

**(i)** For TO3 liquid waste incinerator, the hourly rolling average primary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.

**(ii)** **For TO3 liquid waste incinerator, the hourly rolling average secondary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.**

**(iii)** **For TO4 liquid waste incinerator, the hourly rolling average primary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.**

**(iv)** **For TO4 liquid waste incinerator, the hourly rolling average secondary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.**

In addition, the Permittee shall establish limits on the following parameters. These data collection activities do not require continuous monitoring systems.

(C) Maximum primary waste feed viscosity, established based on manufacturer's recommendations. The primary waste feed viscosity shall be monitored through periodic analysis of the primary waste feed, as specified in the Permittee's Feedstream Analysis Plan.

**(i)** For TO3 liquid waste incinerator, the primary waste feed viscosity shall not exceed 460 centipoise.

**(ii)** **For TO4 liquid waste incinerator, the primary waste feed viscosity shall not exceed 460 centipoise.**

(D) Maximum secondary waste feed viscosity, established based on manufacturer's recommendations. The secondary waste feed viscosity shall be monitored through periodic analysis of the secondary waste feed, as specified in the Permittee's Feedstream Analysis Plan.

**(i)** For TO3 liquid waste incinerator, the secondary waste feed viscosity shall not exceed 460 centipoise.

**(ii)** **For TO4 liquid waste incinerator, the secondary waste feed viscosity shall not exceed 460 centipoise.**

(3) Metals CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(l) and (n)], the Permittee shall install and operate CMS monitors for the following parameters:

(A) Waste Feed Rate - Maximum 12-hour rolling average feed rates for total Hg, semi-volatile metals (cadmium and lead) and low volatile metals (arsenic, beryllium, and chromium) in all waste feedstreams

established from the average of the hourly rolling averages for each performance test run and approved extrapolation techniques;

- (i) For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for total Hg shall not exceed 0.0040 pounds per hour.
- (ii) For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for semi-volatile metals (cadmium and lead) shall not exceed 0.10 pounds per hour.
- (iii) For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for low volatile metals (arsenic, beryllium, and chromium) shall not exceed 0.30 pounds per hour.
- (iv) For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for total Hg shall not exceed 0.0040 pounds per hour.**
- (v) For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for semi-volatile metals (cadmium and lead) shall not exceed 0.22 pounds per hour.**
- (vi) For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for low volatile metals (arsenic, beryllium, and chromium) shall not exceed 0.30 pounds per hour.**

(B) Scrubber Liquids Solid Content -

- (i) Condenser/Absorber - Maximum 12-hour rolling average density of the condenser/absorber sump liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.
  - (a) For TO3 liquid waste incinerator, the 12-hour rolling average density of the condenser/absorber sump liquid shall not exceed 8.367 pounds per gallon.**
  - (b) For TO4 liquid waste incinerator, the 12-hour rolling average density of the condenser/absorber sump liquid shall not exceed 8.401 pounds per gallon.**
- (ii) Hydro-Sonic™ Scrubber 1st Stage - Maximum 12-hour rolling average density of the demister sump liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.
  - (a) For TO3 liquid waste incinerator, the 12-hour rolling average density of the demister sump liquid shall not exceed 8.361 pounds per gallon.**

**(b) For TO4 liquid waste incinerator, the 12-hour rolling average density of the demister sump liquid shall not exceed 8.363 pounds per gallon.**

(iii) Polishing Scrubber - Maximum 12-hour rolling average density of the polishing scrubber liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.

**(a) For TO3 liquid waste incinerator, the 12-hour rolling average density of the polishing scrubber liquid shall not exceed 8.494 pounds per gallon.**

**(b) For TO4 liquid waste incinerator, the 12-hour rolling average density of the polishing scrubber liquid shall not exceed 8.511 pounds per gallon.**

(C) Hydro-Sonic™ Scrubber Pressure Drop - Minimum hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber established from the average of the performance test run averages and based on the following equation:

$$\text{Equivalent dP} = (\text{Measured dP}) + [(3 \times 10^{-11}) * (\text{Steam Rate})^3] - [(4 \times 10^{-7}) * (\text{Steam Rate})^2] + 0.0026 * (\text{Steam Rate})$$

The Permittee may develop a site-specific model to calculate the equivalent differential pressure. The site-specific model should be submitted to the U.S. EPA Region 5 for approval. The site-specific model can be used for demonstrating compliance with the operating parameter limit on equivalent differential pressure only after approval by U.S. EPA Region 5.

**(i) For TO3 liquid waste incinerator, the hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber shall not be lower than 68 inches of water column.**

**(ii) For TO4 liquid waste incinerator, the hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber shall not be lower than 68 inches of water column.**

(D) Scrubber Liquid to Gas Ratio -

(i) Hydro-Sonic™ Scrubber 1<sup>st</sup> Stage – Minimum hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage free jet nozzle established from the average of the performance test run averages.

**(a) For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage free jet nozzle shall not be lower than 0.00999 (gallons per minute) per (standard cubic feet per minute), wet basis.**

**(b) For TO4 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage free jet nozzle shall not be lower than 0.01038 (gallons per minute) per (standard cubic feet per minute), wet basis.**

(ii) Hydro-Sonic™ Scrubber 2<sup>nd</sup> Stage – Minimum hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle established from the average of the performance test run averages.

**(a) For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle shall not be lower than 0.00593 (gallons per minute) per (standard cubic feet per minute), wet basis.**

**(b) For TO4 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle shall not be lower than 0.00614 (gallons per minute) per (standard cubic feet per minute), wet basis.**

**(E) Those parameters identified in Condition D.12.16(a)(1)(B).**

(4) PM CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(m)], the Permittee shall install and operate CMS monitors for the following parameters:

(A) Those parameters identified in Condition D.12.16(a)(3)(B), (C), (D), and (E); and

(B) Ash Feed Rate - Maximum 12-hour rolling average ash feed rate established from the average of the test run averages.

**(i) For TO3 liquid waste incinerator, the 12-hour rolling average ash feed rate shall not exceed 1,861 pounds per hour.**

**(ii) For TO4 liquid waste incinerator, the 12-hour rolling average ash feed rate shall not exceed 1,628 pounds per hour.**

(5) HCl/Cl<sub>2</sub> and Fluorides CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(o)] and monitoring requirements for PSD sources [326 IAC 2-1.1-11], the Permittee shall install and operate CMS monitors for the following parameters:

(A) Those parameters identified in Condition D.12.16(a)(3)(C) and (D);

(B) Waste Feed Rate - Maximum 12-hour rolling average feed rate for chlorine (organic and inorganic) in all waste feedstreams established from the average of the performance test run averages. [40 CFR 63.1209(o)(1)]

- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for chlorine shall not exceed 2,632 pounds per hour.
- (ii) \_\_\_\_\_ **For TO4 liquid waste incinerator, the 12-hour rolling average feed rate for chlorine shall not exceed 2,771 pounds per hour.**
- (C) Polishing Scrubber Liquid pH - Minimum hourly rolling average polishing scrubber liquid pH established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average polishing scrubber liquid pH shall not be lower than 4.6.
- (ii) \_\_\_\_\_ **For TO4 liquid waste incinerator, the hourly rolling average polishing scrubber liquid pH shall not be lower than 4.4.**
- (D) Polishing Scrubber Liquid Feed Pressure – Minimum hourly rolling average polishing scrubber liquid feed pressure established from manufacturer’s specifications.
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average polishing scrubber liquid feed pressure shall not be lower than 6.8 pounds per square inch, gauge.
- (ii) \_\_\_\_\_ **For TO4 liquid waste incinerator, the hourly rolling average polishing scrubber liquid feed pressure shall not be lower than 6.8 pounds per square inch, gauge.**
- (E) Polishing Scrubber Pressure Drop – Minimum hourly rolling average pressure drop across the polishing scrubber established from manufacturer’s specifications. [40 CFR 63.1209(o)(3)(ii)]
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average pressure drop across the polishing scrubber shall not be lower than 2.3 inches of water column.
- (ii) \_\_\_\_\_ **For TO4 liquid waste incinerator, the hourly rolling average pressure drop across the polishing scrubber shall not be lower than 2.3 inches of water column.**
- (F) Condenser/Absorber Liquid pH – Minimum hourly rolling average condenser/absorber liquid pH established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid pH shall not be lower than 4.1.
- (ii) \_\_\_\_\_ **For TO4 liquid waste incinerator, the hourly rolling average condenser/absorber liquid pH shall not be lower than 4.6.**

- (G) Condenser/Absorber Liquid Feed Pressure – Minimum hourly rolling average condenser/absorber liquid feed pressure established from manufacturer’s specifications. [40 CFR 63.1209(o)(3)(iii)]
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid feed pressure shall not be lower than 8 pounds per square inch, gauge.
- (ii) **For TO4 liquid waste incinerator, the hourly rolling average condenser/absorber liquid feed pressure shall not be lower than 8 pounds per square inch, gauge.**
- (H) Condenser/Absorber Pressure Drop – Minimum hourly rolling average pressure drop across the condenser/absorber established from manufacturer’s specifications. [40 CFR 63.1209(o)(3)(ii)]
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average pressure drop across the condenser/absorber shall not be lower than 2.3 inches of water column.
- (ii) **For TO4 liquid waste incinerator, the hourly rolling average pressure drop across the condenser/absorber shall not be lower than 2.3 inches of water column.**
- (I) Pursuant to 40 CFR 63.1209(o)(3)(v) and a letter from U.S. EPA on September 13, 2004, Condenser/Absorber Liquid to Gas Ratio – Minimum hourly rolling average condenser/absorber liquid to gas ratio established from manufacturer’s specifications for liquid flow rate and the average of the performance test run averages for flue gas flow rate. [40 CFR 63.1209(o)(3)(v)]
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid to gas ratio shall not be lower than 0.0561 (gallons per minute) per (standard cubic feet per minute), wet basis.
- (ii) **For TO4 liquid waste incinerator, the hourly rolling average condenser/absorber liquid to gas ratio shall not be lower than 0.0566 (gallons per minute) per (standard cubic feet per minute), wet basis.**
- (J) Polishing Scrubber Liquid to Gas Ratio – Minimum hourly rolling average polishing scrubber liquid to gas ratio established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(v)]
- (i) \_\_\_\_\_ For TO3 liquid waste incinerator, the hourly rolling average ~~condenser/absorber~~**polishing scrubber** liquid to gas ratio shall not be lower than ~~0.0561~~**0.0124** (gallons per minute) per (standard cubic feet per minute), wet basis.
- (ii) **For TO4 liquid waste incinerator, the hourly rolling average polishing scrubber liquid to gas ratio shall not be lower than 0.0136 (gallons per minute) per (standard cubic feet per minute), wet basis.**

(K) Hydro-Sonic™ Scrubber Liquid pH - Minimum hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]

(i) For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle shall not be lower than 5.8.

(ii) **For TO4 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle shall not be lower than 5.8.**

**Response to Comment 40:**

Since the Notice of Compliance (NOC) for the liquid waste incinerator TO4 was approved by IDEM on August 30, 2007, the approved operating parameters for TO4 have been incorporated into Condition D.12.16(a) as shown above.

**Comment 41:**

On Page 107, in Section D.13, the Facility Description outside the facility description box should be deleted because the same facility description is also included inside the facility description box.

**Response to Comment 41:**

The duplicated unit description in Section D.13 has been removed as follows:

**SECTION D.13 SOLID WASTE INCINERATOR OPERATING CONDITIONS**

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

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

~~(a) The following emissions units are subject to applicable requirements described in this D section. **The Bartlett-Snow solid waste incinerator was permanently shut down on August 30, 2005, and is designated for demolition.**~~

...

**Comment 42:**

On Page 107, the format for inclusion of Conditions D.13.1 through D.13.7 should be revised as follows in accordance with Change Request 116(ii) of the December 21, 2005 submittal and Change Request 54 of the March 26, 2007 submittal:

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

D.13.1 **through D.13.7 Reserved** ~~Particulate Matter Emission Standards [CP 165-4733] [40 CFR Part 52, Subpart P] [326 IAC 4-2]~~

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**Reserved**

~~D.13.2 NESHAP for Hazardous Waste Combustors Nonapplicability [40 CFR Part 63, Subpart EEE]~~

~~Reserved~~

~~D.13.3 NSPS for Hospital, Infectious and Medical Waste Incinerators [40 CFR Part 60, Subpart Ce] [326 IAC 11-6]~~

~~Reserved~~

~~D.13.4 NSPS for Commercial and Industrial Solid Waste Incinerators [326 IAC 11-8]~~

~~Reserved~~

~~D.13.5 Carbon Monoxide Standards [326 IAC 9] [40 CFR Part 52, Subpart P]~~

~~Reserved~~

~~D.13.6 Operating Parameter Limitations~~

~~Reserved~~

~~D.13.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~Reserved~~

On Pages 107 and 108, the format for inclusion of Conditions D.13.8 through D.13.12 should be revised as follows in accordance with Change Request 116(ii) of the December 21, 2005 submittal and Change Request 55 of the March 26, 2007 submittal:

**Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

~~D.13.8 through D.13.12 Reserved Testing Requirements [326 IAC 2-7-6(1) and (6)] [326 IAC 2-1.1-11]~~

~~Reserved~~

~~D.13.9 Scrubber Monitoring~~

~~Reserved~~

~~D.13.10 Incinerator Combustion Chamber Monitoring~~

~~Reserved~~

~~D.13.11 Visible Emission Notations~~

~~Reserved~~

~~D.13.12 Hospital, Medical and Infectious Waste Monitoring~~

~~Reserved~~

**Response to Comment 42:**

The Conditions in Section D.13 have been revised as above.

**Comment 43:**

In Change Request 116(iii) of the December 21, 2005 submittal, Clinton Laboratories had requested that the following changes be made to Condition D.13.13:

"D.13.13 Record Keeping Requirements

- (a) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, The Permittee shall maintain records of the scrubber

monitoring as required by Condition D.13.9 **of Part 70 Operating Permit, dated October 1, 2004,** as follows:

- (i) The scrubber water feed rate for Stage 1 and Stage 2 and pressure drop across the hydro-sonic scrubber ~~shall be recorded~~ at least once per day.
  - (ii) The pH of the hydro-sonic scrubber water ~~shall be recorded~~ at least once per hour.
- (b) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005,** ~~a~~As required by Condition D.13.10 **of Part 70 Operating Permit, dated October 1, 2004,** the Permittee shall maintain records of the continuous monitoring of combustion chamber temperature (primary burner and afterburner), and 60-minute rolling average stack gas flow rate at least once per hour. The Permittee must also keep records of number of drums fed to the incinerator per hour, the weight of each drum, and the waste classification (hazardous or non-hazardous) for each drum.
- (c) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005,** ~~t~~The Permittee shall maintain records of the visible emissions monitoring, as required by Condition D.13.11 **of Part 70 Operating Permit, dated October 1, 2004.**
- (d) Beginning September 30, 2004 **and until September 30, 2005,** the Permittee shall maintain records of the weight of hospital, medical and infectious waste; and the total weight of wastes incinerated each calendar quarter.”
- (e) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Operation and Maintenance Plan, as required by Condition D.13.1(c)(4); and Preventive Maintenance Plan, as required by Condition D.13.7 of Part 70 Operating Permit, dated October 1, 2004.**
- (f) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Compliance Response Plan, as required by Condition D.13.11(e) of Part 70 Operating Permit, dated October 1, 2004.**”

In accordance with this request, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already included the requested changes. However, in the September 28, 2007 version of the permit, IDEM has made additional changes to Condition D.13.13, which resulted in lack of clarity that Clinton Laboratories intended to preserve when it originally requested the changes. In addition, the reference to Condition C.18 is unnecessary in Condition D.13.13. No such reference to Condition C.18 exists in record keeping requirements in other sections of the permit.

Clinton Laboratories is requesting that the following changes be made to Condition D.13.13 to make it identical to the language in the May 16, 2006 version of the Preliminary Draft Title V operating permit:

“D.13.13 Record Keeping Requirements

- (a) For the operation of the Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain **records of the scrubber monitoring as required by Condition D.13.9 of Part 70 Permit, issued**

~~the following records for the scrubber in accordance with Condition C.18 – General Record Keeping Requirements:~~

- (1) The scrubber water feed rate for Stage 1 and Stage 2 and pressure drop across the hydro-sonic scrubber recorded at least once per day.
  - (2) The pH of the hydro-sonic scrubber water recorded at least once per hour.
- (b) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, **as required by Condition D.13.10 of Part 70 Permit, issued October 1, 2004**, the Permittee shall maintain records of the continuous monitoring of combustion chamber temperature (primary burner and afterburner), and 60-minute rolling average stack gas flow rate at least once per hour ~~in accordance with Condition C.18 – General Record Keeping Requirements~~. The Permittee must also keep records of number of drums fed to the incinerator per hour, the weight of each drum, and the waste classification (hazardous or non-hazardous) for each drum.
- (c) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the visible emissions monitoring, **as required by Condition D.13.11 of Part 70 Permit, issued October 1, 2004** ~~in accordance with Condition C.18 – General Record Keeping Requirements~~.
- (d) Beginning September 30, 2004 and until September 30, 2005, the Permittee shall maintain records of the weight of hospital, medical and infectious waste; and the total weight of wastes incinerated each calendar quarter ~~in accordance with Condition C.18 – General Record Keeping Requirements.~~
- (e) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Operation and Maintenance Plan, **as required by Condition D.13.1(c)(4); and Preventive Maintenance Plan, as required by Condition D.13.7 of Part 70 Permit, issued October 1, 2004** ~~in accordance with Condition C.18 – General Record Keeping Requirements~~.
- (f) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Compliance Response Plan, **as required by Condition D.13.11(e) of Part 70 Permit, issued October 1, 2004** ~~in accordance with Condition C.18 – General Record Keeping Requirements.~~

**Response to Comment 43:**

Condition D.13.13 has been revised as follows as the result of this comment:

**D.13.13 Record Keeping Requirements**

---

- (a) For the operation of the Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain **records of the scrubber monitoring as required by Condition D.13.9 of T165-6462-00009, issued October 1, 2004, as follows** ~~the following records for the scrubber in accordance with Condition C.18 – General Record Keeping Requirements:~~
- ...
- (b) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, **as required by Condition D.13.10 of T165-6462-00009, issued October**

- 1, 2004**, the Permittee shall maintain records of the continuous monitoring of combustion chamber temperature (primary burner and afterburner), and 60-minute rolling average stack gas flow rate at least once per hour ~~in accordance with Condition C.18 – General Record Keeping Requirements~~. The Permittee must also keep records of number of drums fed to the incinerator per hour, the weight of each drum, and the waste classification (hazardous or non-hazardous) for each drum.
- (c) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the visible emissions monitoring, **as required by Condition D.13.11 of T165-6462-00009, issued October 1, 2004** ~~in accordance with Condition C.18 – General Record Keeping Requirements~~.
  - (d) Beginning September 30, 2004 and until September 30, 2005, the Permittee shall maintain records of the weight of hospital, medical and infectious waste; and the total weight of wastes incinerated each calendar quarter ~~in accordance with Condition C.18 – General Record Keeping Requirements.~~
  - (e) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Operation and Maintenance Plan, **as required by Condition D.13.1(c)(4); and Preventive Maintenance Plan, as required by Condition D.13.7 of T165-6462-00009, issued October 1, 2004** ~~in accordance with Condition C.18 – General Record Keeping Requirements~~.
  - (f) For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Compliance Response Plan, **as required by Condition D.13.11(e) of T165-6462-00009, issued October 1, 2004** ~~in accordance with Condition C.18 – General Record Keeping Requirements~~.

**Comment 44:**

On Page 112, in Facility Description for Section D.15, a blank line should be inserted after the end of the second sentence.

**Response to Comment 44:**

The requested change has been made to the unit description box in Section D.15 as follows:

**SECTION D.15 SUPPORT OPERATIONS – TRANSFER OF AFFECTED WASTEWATER FOR OFFSITE TREATMENT CONDITIONS**

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

The information in this facility description section does not constitute enforceable conditions. The transfer of affected wastewater for offsite treatment relates to either of the following situations:

- (a) Shipment of affected wastewater stored onsite to an offsite treatment facility; or

...

**Comment 45:**

On Page 115, the format for inclusion of Conditions E.1.1 and E.1.2 should be revised as follows in accordance with Change Request 121 of the December 21, 2005 submittal and Change Request 58 of the March 26, 2007 submittal:

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

~~E.1.1 and E.1.2 **Reserved** — LDAR Standards for BPM Process System Components [40 CFR 63.1255, 40 CFR Part 63 Subpart I, 326 IAC 8-5-3(b)(6), 326 IAC 2-2]~~

**Reserved**

~~E.1.2 — Exceptions to LDAR Standards for BPM Process System Components~~

**Reserved**

**Response to Comment 45:**

The conditions in Section E.1 have been revised as follows as shown above.

**Comment 46:**

In Change Request 124 of the December 21, 2005 submittal, Clinton Laboratories had requested that the following changes be made to Condition E.1.3(a):

“(a) **From October 1, 2004 to the date on which the Permittee submitted the Initial LDAR Report of compliance information in accordance with Condition E.1.3(b)(1) of Part 70 operating permit, dated October 1, 2004 – records of information and data related to Condition E.1.1 of Part 70 Operating Permit, dated October 1, 2004,** shall be kept in accordance with 40 CFR 63.1255(g), including but not limited to.”

In accordance with this request, the May 16, 2006 version of the Preliminary Draft Title V operating permit had already included the requested changes. However, in the September 28, 2007 version of the permit, IDEM has made additional changes to Condition E.1.3(a), which resulted in lack of clarity that Clinton Laboratories intended to preserve when it originally requested the changes.

Clinton Laboratories is requesting that the following changes be made to Condition E.1.3(a) to make it identical to the language in the May 16, 2006 version of the Preliminary Draft Title V operating permit:

“(a) From October 1, 2004 to the date on which the Permittee submitted the ~~Initial final~~ **Initial final LDAR Report of compliance information report, in accordance with Condition E.1.3(b)(1) of Part 70 operating permit, dated October 1, 2004 – records of information and data related to Condition E.1.1 of Part 70 operating permit, dated October 1, 2004,** ~~showing compliance with the LDAR Standards for BPM Process System Components~~ shall be kept in accordance with 40 CFR 63.1255(g), including but not limited to.”

**Response to Comment 46:**

Condition E.1.3 has been revised as follows:

**E.1.3 Record Keeping Requirements**

(a) From October 1, 2004 to the date on which the Permittee submitted the ~~initial final~~ **initial final LDAR Report of compliance information report, in accordance with Condition E.1.3(b)(1) in T165-6462-00009, issued October 1, 2004. Records** ~~records of~~

information and data **related to Condition E.1.1 in T165-6462-00009, issued October 1, 2004,** ~~showing compliance with the LDAR Standards for BPM Process System Components~~ shall be kept in accordance with 40 CFR 63.1255(g), including but not limited to:

...

**Comment 47:**

On Page 128, an extra blank line between Conditions F.1.3(a)(5)(D)(ii)(a) and (b) can be deleted.

**Response to Comment 47:**

The extra blank line between Conditions F.1.3(a)(5)(D)(ii)(a) and (b) has been removed as requested.

**Comment 48:**

In accordance with Change Request 75 of the March 26, 2007 submittal, On Page 143, "PART 7: SSM Summary" should be revised as "PART 8: SSM Summary".

**Response to Comment 48:**

The quarterly report form for Control Device CMS Operations has been revised as follows:

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

**Sections D.11 & D.12 – Control Device CMS Operations  
Streamlined CMS Periodic Report**

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009

Quarter: \_\_\_\_\_ Year: \_\_\_\_\_

...

**PART 78: SSM Summary**

REGULATED SOURCE	DATE	DURATION (hours)	SSM EVENT TYPE	SSM PLAN FOLLOWED?	NOTES

**Comment 49:**

In accordance with Change Request 161 of the December 21, 2005 submittal and Change Request 78 of the March 26, 2007 submittal, the following changes need to be made to the form on Page 152:

The row labeled "Bartlett-Snow Solid Waste Incinerator" and the next five rows below this row should be deleted. In the next row "BPM Building Operations" should be renamed "Support Operations". In the row labeled "BPM and BPM Support Total", it should be revised to "Total".



**Comment 50:**

On Page 2 of the TSD, in the last paragraph of "Source Status", "40 CFR 63.41" should be revised to "40 CFR 63.2".

**Response to Comment 50:**

Both 40 CFR 63.2 and 40 CFR 63.41 include the definition for HAP major sources. No change has been made as a result of this comment.

**Comment 51:**

In the TSD, the information under "Actual Emissions" should be revised as follows:

The following table shows the actual emissions from the source. This information reflects the 2003~~6~~ OAQ emission data, which is the most recent data for the source.

Pollutant	Actual Emissions (tons/year)
PM	<del>0.05154</del>
PM10	<del>42072</del>
PM2.5	NA
SO <sub>2</sub>	<del>1,447,1779</del>
VOC	<del>844450</del>
CO	<del>4629</del>
NO <sub>x</sub>	<del>670664</del>
HAP	NA

**Response to Comment 51:**

The actual emission inventory information for the year of 2006 has not been approved by IDEM, OAQ. The most current emission data, which has been verified by IDEM, OAQ, is the emission information in 2003. Therefore, no change has been made as a result of this comment.

**Comment 52:**

On Page 2 of the TSD, in Paragraph (d) of "County Attainment Status"; and on Page 3, in "Description of Proposed Modification", the word "bulk" before "pharmaceutical" should be deleted.

On Page 3 of the TSD, in "Description of Proposed Modification", the date of submittal should be changed from "December 29" to "December 21".

On Page 3 of the TSD, in "Description of Proposed Modification", "incinerators TO3" should be revised to "incinerator TO3".

On Page 4 of the TSD, in Paragraph (b) of the "Federal Rule Applicability Determination", the words "vacated by U.S. EPA on March 26, 2007" should be revised to "vacated by DC Circuit Court of Appeals" on July 30, 2007".

On Page 4 of the TSD, in "State Rule Applicability Determination", a blank space needs to be inserted between "326 IAC 8-5-3" and "(Synthesized)".

On Page 4 of the TSD, in the second paragraph in “Compliance Determination and Monitoring Requirements”, the word “sources=s” should be corrected to “source’s”.

**Response to Comment 52:**

IDEM OAQ acknowledges the requested changes in Comment 52. However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

**Comment 53:**

On Page 4 of the TSD, Section 1(a) in “Compliance Determination and Monitoring Requirements” should be revised as follows to make it consistent with the permit:

“The Permittee shall record the pressure drop across the baghouse used in conjunction with coal-fired boiler C31 at least once per day when the boiler is in operation. For this condition, the boiler is considered to be in operation when coal is being burned. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water ~~or a range established during the latest stack test~~, the Permittee shall take reasonable response steps in accordance with the Compliance Response Plan required by Condition C.15 ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~. A pressure drop reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with the ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~, shall be considered a deviation from this permit.”

**Response to Comment 53:**

The proposed change has been made to Condition D.1.9 (see the response to Comment 17). No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

**Comment 54:**

On Page 5 of the TSD, Section 1(b) in “Compliance Determination and Monitoring Requirements” should be deleted to make it consistent with the permit.

**Response to Comment 54:**

The proposed change has been made to the permit (see the response to Comment 18). No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

**Comment 55:**

The Permittee requested the same changes proposed in Comments 3 through 49 for the conditions in Section B, C, and D of the permit be made to the TSD as well.

**Responses to Comment 55:**

IDEM agrees to make some of the changes proposed in Comments 3 through 49. The specific changes to the permit condition in the final permit can be found in the responses to Comments 3 through 49. However, no changes have been made to the TSD because the

OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Permit

### Source Description and Location

Source Name: Eli Lilly and Company, Clinton Laboratories Facility  
Source Location: 10500 South State Road 63, Clinton, Indiana 47842  
County: Vermillion  
SIC Code: 2833, 2834, 2879  
Operating Permit No.: 165-6462-00009  
Operating Permit Issuance Date: October 1, 2004  
Significant Permit Modification No.: 165-22481-00009  
Permit Reviewer: ERG/YC

### Existing Approvals

The source was issued Part 70 Operating Permit No.:T165-6462-00009 on October 1, 2004. No approvals have been issued to this source since the issuance of this Part 70 permit.

### County Attainment Status

The source is located in Vermillion County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (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 ozone. Vermillion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Vermillion County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Vermillion 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.

- (d) Since this source is classified as a bulk pharmaceutical manufacturing plant, it is considered to be in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (e) **Fugitive Emissions**  
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

**Source Status**

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Greater than 100
PM10	Greater than 100
SO <sub>2</sub>	Greater than 100
VOC	Greater than 100
CO	Greater than 100
NO <sub>x</sub>	Greater than 100

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the potential to emit calculations for the source as provided in Part 70 Permit No.: 165-6462-00009, issued October 1, 2004.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Single HAP	Greater than 10
Combination of HAPs	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data, which is the most recent data for the source.

Pollutant	Actual Emissions (tons/year)
PM	0.05
PM10	120
PM2.5	NA
SO <sub>2</sub>	1,447
VOC	844
CO	46
NO <sub>x</sub>	670
HAP	NA

### Description of Proposed Modification

Eli Lilly and Company, Clinton Laboratories is an existing bulk pharmaceutical manufacturing plant with associated support facilities. The source was issued a Part 70 Permit No.: T165-6462-00009 on October 1, 2004. The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Eli Lilly and Company, Clinton Laboratories Facility on December 29, 2005, relating to the following modifications:

- (a) Permanently shutting down the bulk pharmaceutical manufacturing (BPM) operations. Since the source is required to keep the records associated with the BPM production operations for 5 years, the Permittee requested to keep the description and the recordkeeping requirements for the BPM production operations in the permit.
- (b) Permanently shutting down the existing one (1) Bartlett-Snow incinerator; and
- (c) U.S. EPA did not approve the Permittee's request to waive the initial comprehensive test for liquid waste incinerators TO3. Therefore, comprehensive tests are required for two (2) existing liquid waste incinerators (identified as TO3 and TO4) at this source. The language in Condition D.12.14 has been revised to clarify that the comprehensive testing is required for both liquid waste incinerators TO3 and TO4.

On August 8, 2007, the Permittee submitted the additional information to IDEM, OAQ stating that the existing electrostatic precipitator installed with coal-fired boiler C31 has been replaced by a baghouse. Therefore, the existing permit conditions related to the electrostatic precipitator in Section D.1 of T165-6462-00009, issued on October 1, 2004 have been removed from the permit. The Permittee is required to perform PM stack testing for boiler C31 within 180 days after the initial start-up of the new baghouse associated with this boiler.

The Permittee also requested several changes to the unit description and permit conditions as specified in the "Proposed Changes" section.

### Enforcement Issues

There are no pending enforcement actions related to this modification.

### Emission Calculations

There are no emission calculations associated with this significant permit modification.

### Permit Level Determination – Part 70

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

There are no increases in emissions from the modification of any criteria pollutants or HAPs.

This modification will be incorporated into the Part 70 Operating Permit through a Significant Permit Modification issued pursuant to 326 IAC 2-7-12(d) because these modifications do not qualify as an administrative amendment or a minor permit modification, since there are significant changes in existing permit conditions.

### Permit Level Determination – Prevention of Significant Deterioration (PSD) or Emission Offset

The source is a major stationary source, as defined in 326 IAC 2-2-1, and is subject to PSD requirements when major modifications occur at the plant. This modification to an existing major

stationary source is not major because there are no emission increases as a result of this modification. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

#### **Federal Rule Applicability Determination**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this proposed modification.
- (b) The Permittee did not propose modifications to the existing boilers. The National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7480, Subpart DDDDD, 326 IAC 20-95) was vacated by U.S. EPA on March 26, 2007.
- (c) The requirements of 40 CFR 64.2, Compliance Assurance Monitoring (CAM) do not apply to any of the units revised as part of this significant permit modification because this modification does not involve any new emission units.

#### **State Rule Applicability Determination**

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

The Permittee has permanently shut down the bulk pharmaceutical manufacturing operations (see the Proposed Changes section of this TSD for details). Therefore, the provisions of 326 IAC 8-5-3 are no longer included in the permit for this source.

#### **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance monitoring requirements applicable to this source are as follows:

1. The existing coal fired boiler C31, which is controlled by a baghouse now, has applicable compliance monitoring conditions as specified below:
  - (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with coal-fired boiler C31 at least once per day when the boiler is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) In the event that bag failure has been observed:
- (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
  - (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Note: Visible emission notations are not required because visible emissions from this boiler are monitored by a continuous opacity monitoring system.

These monitoring conditions are necessary because the baghouse associated with the coal fired boiler C31 must operate properly to ensure compliance with 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating).

#### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T165-6462-00009, issued October 1, 2004 in order to: 1) incorporate the modification described in this document, and 2) update and clarify state and federal rule requirements. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**. The Table of Contents has been updated accordingly.

1. Reference to "bulk pharmaceutical manufacturing" was deleted from the Section A and changes to process descriptions incorporated as requested by the Permittee.
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) D.1 Utilities Operations: The utilities operations consist of one coal-fired boiler equipped with an ash handling system, four natural gas/fuel oil boilers, and other miscellaneous support equipment. The boilers provide steam to process operations in ~~bulk pharmaceutical manufacturing and~~ animal health manufacturing. The detailed equipment list is located in Section D.1 of this permit.  
...
- (e) D.5 Bulk Pharmaceutical Manufacturing (BPM) – Process Operations: The emission units in the BPM production operations **have been permanently shut down and are designated for demolition** can be generally described as process vessels (tanks), crystallizers, filters, centrifuges, dryers, and process condenser systems and are referred to as process vents. The **applicable requirements for emission units in the BPM production operations that were permitted earlier are provided** ~~detailed equipment list is located~~ in Section D.5 of this permit.

- (f) D.6 Bulk Pharmaceutical Manufacturing (BPM) – Solvent Recovery Operations: The BPM solvent recovery emission units **have been permanently shut down and are designated for demolition** can be generally described as columns, stills, evaporators, accumulators and receivers and are referred to as process vents. The **applicable requirements for emission units in the solvent recovery operations that were permitted earlier are provided** detailed equipment list is located in Section D.6 of this permit.
- (g) D.7 Bulk Pharmaceutical Manufacturing (BPM) – Solvent Storage Tank Operations: The BPM solvent storage tanks **have been permanently shut down and are designated for demolition** are defined as any vessel designed to store raw material feedstocks or used solvent to be recovered that contain VOCs and/or VOHAP. Pressure vessels greater than 204.9 kPa without emissions to the atmosphere, vessels attached to motor vehicles, or vessels used to store beverage alcohol are not BPM solvent storage tanks. The **applicable requirements for solvent storage tanks that were permitted earlier are provided** detailed equipment list is located in Section D.7 of this permit.
- (h) D.8 Bulk Pharmaceutical Manufacturing (BPM) – Waste Storage Tank Operations: The BPM waste storage tanks are defined as any waste management unit designed to contain an accumulation of **affected wastewater or offsite** waste material containing VOCs and/or VOHAP. Pressure vessels greater than 204.9 kPa without emissions to the atmosphere or vessels attached to motor vehicles are not BPM waste storage tanks. The detailed equipment list is located in Section D.8 of this permit.
- (i) D.9 BPM Waste Containers: Waste containers are segregated into small and large containers. A small BPM waste container, such as a drum, contains **affected wastewater or offsite waste material containing** VOC/VOHAP with a capacity greater than 26.4 gallons and equal to or less than 110.5 gallons. A large BPM waste container, such as a melon or a tanker truck, contains **affected wastewater or offsite waste material containing** VOC/VOHAP with a capacity greater than 110.5 gallons. Identification of these types of containers have not been individually listed given they are portable and continually change.
- (j) D.10 BPM Individual Drain Systems (IDSs): The BPM IDSs **have been permanently shut down and are designated for demolition** consist of stationary systems used to convey affected wastewater streams to a waste management unit. Segregated stormwater sewer systems, designed and operated for the sole purpose of collecting rainfall runoff at a facility, and segregated from all other IDSs, are excluded from this definition. The **applicable requirements for individual drain systems that were permitted earlier are provided** detailed equipment list is located in Section D.10 of this permit.
- ...
- (m) D.13 BPM Control Systems – Bartlett-Snow Solid Waste Incinerator: The Bartlett-Snow solid waste incinerator **was permanently shut down on August 30, 2005 and is designated for demolition** provides treatment of Lilly hazardous and non-hazardous solid waste to support its operational requirements. The Bartlett-Snow incinerator consists of a rotary kiln and afterburner, a packed bed scrubber, a Hydro-Sonic® scrubber, and a stack. The **applicable requirements for Bartlett-Snow solid waste incinerator that was permitted earlier are provided** detailed equipment list is located in Section D.13 of this permit.
- (n) D.14 BPM Support Operations - General Wastewater Conditions: The emission units associated with the BPM wastewater operations can generally be described as storage and transfer facilities (wastewater tanks, **and** containers ~~and individual drain systems~~) and treatment facilities (incineration or off-site treatment). The specific emission units are described in Sections D.8, D.9, ~~D.10~~, D.12 and D.15 of this permit. The general conditions for these types of operations are described in Section D.14 of this permit.

2. In Section A.2 (k), the description for “BPM Control Systems”, “BPM manufacturing and support operations”, and “process and support operations” were revised to “Control Systems”, “waste storage operations”, and “waste storage operations”, respectively. In Section A.2 (l), the descriptions for “BPM Control Systems” was revised to “Control Systems”.
- ...
- (k) D.11 BPM Control Systems – RTO Operations: The regenerative thermal oxidizer (RTO) system consists of a closed-vent system that transports fume streams exhausted from the ~~BPM manufacturing and support~~ **waste storage** operations to the RTOs. The RTOs, designed to thermally destruct the VOC and/or VOHAP laden fume streams from the ~~process and support~~ **waste storage** operations, are also equipped with caustic scrubbing systems to control hydrogen halide and halogen emissions. The detailed equipment list is located in Section D.11 of this permit.
- (l) D.12 BPM Control Systems – TO3/TO4 Liquid Waste Incinerators: The TO3/TO4 liquid waste incinerators provide treatment of Lilly hazardous and non-hazardous waste to support its operational requirements, including high Btu liquids (primary waste) and low Btu liquids (secondary waste). The TO3/TO4 incinerators consist of a primary combustion chamber followed by a wet quench system, a condenser/absorber, a Hydro-Sonic® scrubber, a polishing scrubber, and a stack with continuous emissions monitoring. The detailed equipment list is located in Section D.12 of this permit.
- ...
3. In Section A.2 (o), the word “BPM” was deleted, and the word “generated” was changed to “stored”.
- ...
- (o) D.15 BPM Support Operations – Transfer of Affected Wastewater for Offsite Treatment Conditions: The transfer of affected wastewater for offsite treatment relates to either the shipment of affected wastewater ~~generated~~ **stored** onsite to an offsite treatment facility, or receipt of an offsite affected wastewater to be treated onsite. The specific conditions for these types of operations are described in Section D.15 of this permit.
- ...
4. As a result of Clinton Laboratories’ decision to permanently shut down the BPM production operations and several of the BPM support operations, the equipment and building cleaning operations that are described in Section A.2 (p) are no longer being carried out. Therefore, Section A.2 (p) was deleted as shown.
- ...
- ~~(p) Equipment and Building Cleaning Operations in Buildings C3, C13, C13A, C19, C61, C63, C63A, C64B, C64D, and C64E, Using Cleaning Solution(s) Containing Volatile Organic Compounds (VOC) to Remove Trace Antibiotic Residues: Because potential emissions exceed 3 pounds of VOCs per hour and 15 pounds of VOCs per day and the operations are not listed in 326 IAC 2-7-1(21) or 326 IAC 2-7-1(40), the operations are not insignificant or trivial activities. These operations, however, are not subject to any emission limits or standards, work practices, testing, monitoring, record-keeping or reporting requirements. Therefore, the permit does not include a D section for these operations.~~
- ...
5. The following insignificant activities under Section A.3 were revised or deleted as requested by the Permittee. Section A.3 (a)(2) and A.3 (a)(5) were deleted and the remaining conditions renumbered accordingly as shown.
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- (a) This stationary source consists of the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):
- ...

- (2) ~~D.10 BPM Individual Drain Systems (IDSs): Individual drain systems in the BPM operating areas each emitting less than 3 pounds VOC per hour or 15 pounds VOC per day. [40 CFR 63.1256(e), 40 CFR 63.689(b), and 326 IAC 2-2]~~
- (23) D.8 Bulk Pharmaceutical Manufacturing (BPM) – Waste Storage Tank Operations: Various BPM waste tanks **containing affected wastewater or offsite waste material, and knock-out pots in the BPM operating areas** each emitting less than 3 pounds VOC per hour or 15 pounds VOC per day. [40 CFR 63.1256(b), 40 CFR 63.685, 40 CFR 60.110b, 326 IAC 2-2, and 326 IAC 8-5-3]
- (34) D.9 BPM Waste Containers: Small and large waste containers in the BPM operating areas, **containing affected wastewater or offsite waste material**, each emitting less than 3 pounds VOC per hour or 15 pounds VOC per day. [40 CFR 63.1256(d), 40 CFR 63.688, 326 IAC 2-2]
- (5) ~~D.5 BPM Process Operations: Heat exchange systems in the BPM operating areas are classified as insignificant activities under the closed loop heating and cooling system clause pursuant to 326 IAC 2-7-1(21)(FF). [40 CFR 63.1252(c)]~~
6. The one (1) existing Bartlett-Snow incinerator at the source ceased operations prior to September 1, 2005. Therefore, Condition B.13 (b)(4) (formerly Condition B.12) was revised as follows:  
...  
(4) **Section 111(d) Emission Guidelines:** ~~With the exception of 40 CFR Part 60, Subpart Ce and 326 IAC 11-6, and 40 CFR Part 60, Subpart DDDD and 326 IAC 11-8, which will apply to the Bartlett-Snow Incinerator on September 30, 2004, no other emission guidelines in 40 CFR Part 60, 40 CFR Part 62, Subpart P, and 326 IAC 11 are applicable to this source because the source does not own or operate an affected facility subject to those requirements.~~  
...
7. Since Clinton Laboratories has permanently shut down the BPM production and several of the BPM support operations, Condition B.13 (b)(14) was revised as follows:  
...  
(14) 40 CFR Part 63, Subpart FFFF – Miscellaneous Organic Chemical Production and Processes: This source is not subject to 40 CFR Part 63, Subpart FFFF because **the source does not contain any miscellaneous organic chemical manufacturing process units (MCPU)** ~~all the affected facilities at the source that would otherwise be subject to Subpart FFFF are subject to 40 CFR Part 63, Subpart GGG.~~  
...
8. The one (1) existing Bartlett-Snow incinerator at the source ceased operations prior to September 1, 2005. Therefore, Conditions B.12(b)(22) and B.12(b)(23) were added as shown. Since Clinton Laboratories has permanently shut down the BPM production and several of the BPM support operations, the provisions of 40 CFR Part 63, Subpart I, Subpart RR, and Subpart EEEE are no longer applicable requirements for the source. Therefore, Conditions B.12(b)(24) through (b)(26) were added.  
...  
(22) **40 CFR Part 60, Subpart Ec – Hospital/Medical/Infectious Waste Incinerators: This source does not contain any emission units described in 40 CFR Part 60, Subpart Ec. Therefore, the source is not subject to the requirements of those rules.**  
(23) **40 CFR Part 60, Subpart CCCC – Commercial-Industrial Solid Waste Incinerators: This source does not contain any emission units described in 40 CFR Part 60, Subpart CCCC. Therefore, the source is not subject to the requirements of those rules.**

- (24) **40 CFR Part 63, Subpart I – Equipment Leaks:** This source does not have any pharmaceutical production processes that use carbon tetrachloride or methylene chloride, or any other processes described in 40 CFR Part 63, Subpart I. Therefore, the source is not subject to the requirements of those rules.
- (25) **40 CFR Part 63, Subpart RR – Individual Drain Systems:** This source does not have any individual drain systems that are described in 40 CFR Part 63, Subpart RR. Therefore, the source is not subject to the requirements of those rules.
- (26) **40 CFR Part 63, Subpart EEEE – Organic Liquids Distribution:** This source does not have any organic liquid distribution operations described in 40 CFR Part 63, Subpart EEEE. Therefore, the source is not subject to the requirements of those rules.
9. The one (1) existing Bartlett-Snow incinerator at the source ceased operations prior to September 1, 2005. Therefore, 326 IAC 9-1 is no longer an applicable requirement for the source. Therefore, Condition B.13 (b)(27) was added to provide clarification as follows:  
...
- (27) **326 IAC 9 – Carbon Monoxide Rules:** Except for TO3/TO4 liquid waste incinerators, this source does not contain any emission units subject to the provisions of 326 IAC 9-1-2. TO3/TO4 liquid waste incinerators are not subject to the requirements of 326 IAC 9-1 because they are subject to the requirements of 40 CFR Part 63, Subpart EEE. Therefore, this source is not subject to the requirements of 326 IAC 9-1.
10. The Part 70 Permit No.: 165-6462-00009, issued October 1, 2004, does not currently require the submission of the report of the results of quarterly cylinder gas audits and annual relative accuracy test audits, which is an applicable requirement under 326 IAC 3-5-5(e)(1). Therefore, item (g) under Condition C.11 was added as follows:  
...
- (g) **The Permittee shall prepare and submit to IDEM, OAQ a written report of the results of the quarterly cylinder gas audits and annual relative accuracy test audits within thirty (30) days after the end of each calendar quarter. The report must contain the information required by 326 IAC 3-5-5(e)(1). 326 IAC 3-5-5(e)(1) is not federally enforceable.**  
...
11. The Part 70 Permit No.: 165-6462-00009, issued October 1, 2004, does not currently require the submission of the updates to standard operating procedures (SOP) for all of the required continuous emissions monitoring systems (CEMS) on a biennial basis, which is an applicable requirement under 326 IAC 3-5-4(a). Therefore, item (h) under Condition C.11 was added as follows:  
...
- (h) **If the Permittee is required by 326 IAC 3-5-4(a) and Section D to prepare and implement a written standard operating procedure (SOP) for CEMS, it must be submitted to IDEM, OAQ within ninety (90) days after monitor installation. If revisions are made to the SOP, updates shall be submitted to IDEM, OAQ biennially. 326 IAC 3-5-4(a) is not federally enforceable.**  
...
12. The following heading was added before Condition C.13 to make it consistent with the Table of Contents:  
**“Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]”**
13. Emission unit ID Ash Tank for coal-fired boiler C31 does not have a scrubber as the control device. The baghouse is the only control device used for controlling particulate emissions from this unit and shall be operated at all times when the ash tank is in operation to demonstrate compliance with the

provisions of 326 IAC 6-3-2. In addition, the coal-fired boiler C31 is now controlled by a baghouse, instead of an ESP. In addition, there is a new powdered activated carbon silo added to building C31. Therefore, the facility description in Section D.1 has been revised as follows and the compliance monitoring and the associated recordkeeping requirements for ESP have been replaced by the compliance monitoring and the associated recordkeeping requirements for baghouses:

**SECTION D.1 UTILITIES OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section.						
Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control Devices**	Capacity	Units
C31	Ash Tank	Ash Tank for C31 Coal-fired Boiler	PVC31ASH TK TRNSFR	Scrubber**, Baghouse**	6,361	Cubic Feet
C31	BLR01	Coal-fired Boiler	PVC31ESP	Electrostatic Precipitator**, Baghouse**	243	MMBTU/hr
C21	BLR01	Natural Gas/#2 Oil Fired Boiler	PVC21BLR1		79.5	MMBTU/hr
C21	BLR02	Natural Gas/#2 Oil Fired Boiler	PVC21BLR2		79.5	MMBTU/hr
C21	BLR03	Natural Gas/#2 Oil Fired Boiler	PVC21BLR3		79.5	MMBTU/hr
C21	BLR04	Natural Gas/#2 Oil Fired Boiler	PVC21BLR4		140.6	MMBTU/hr
* Emissions units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21). ** Control devices marked with a double asterisk are required to meet an applicable limitation. . . .						

**D.1.5 Particulate Control**

- (a) In order to comply with condition D.1.1(a), the baghouse for particulate control shall be in operation and control emissions from coal-fired boiler C31 at all times that this boiler is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**D.1.5 D.1.6 Testing Requirements [326 IAC 2-7-6(1) and (6)]**

- (a) ~~The Permittee shall perform particulate matter performance tests for the coal fired boiler (C31 BLR01) utilizing Methods 5 or 17 (40 CFR Part 60, Appendix A) for PM or other methods as approved by the Commissioner. The initial stack test must be conducted within 36 months after issuance of this permit. These tests shall be repeated every third calendar year from the calendar year of the most recently completed stack test. The requirements for conducting performance tests are described in Section C, Condition C.8 – Performance Testing.~~  
**Within 180 days after initial start-up of the baghouse associated with boiler C31, the**

. . .

**D.1.6 D.1.7 Coal Sampling and Analysis for SO<sub>2</sub> [326 IAC 3-7] [326 IAC 7-2]**

**D.1.7 D.1.8 Fuel Oil Sampling and Analysis for SO<sub>2</sub> [326 IAC 7-2] [326 IAC 3-7]**

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **~~D.1.8~~ D.1.9 Continuous Opacity Monitoring [326 IAC 3-5]**

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#### **~~D.1.9 Electrostatic Precipitator Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~**

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- ~~(a) The ability of the ESP to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.~~
- ~~(b) Reasonable response steps shall be taken in accordance with the Compliance Response Plan required by Condition C.15, whenever the percentage of T-R sets in service falls below 75 percent (75%). T-R set failure resulting in less than 75 percent (75%) availability is not a deviation from this permit. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a violation of this permit.~~

#### **D.1.10 Parametric Monitoring**

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The Permittee shall record the pressure drop across the baghouse used in conjunction with coal-fired boiler C31 at least once per day when the boiler is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

#### **D.1.11 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line (or emissions unit – choose the most appropriate). Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

### **~~D.1.10~~ D.1.12 Coal Characteristics and Consumption Records**

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### **~~D.1.11~~ D.1.13 Fuel Oil Characteristics and Consumption Records**

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**D.1.12 D.1.14 Continuous Opacity Monitoring**

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~~D.1.13 ESP Parameters Monitoring Records~~

~~The Permittee shall record the parameters required to be monitored by Condition D.1.9.~~

**D.1.15 Record Keeping Requirements**

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- (a) **To document compliance with Condition D.1.10, the Permittee shall maintain daily records of the pressure drop reading for the baghouse associated with coal-fired boiler C31. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

~~D.1.14 D.1.16 Standard Operating Procedures~~

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~~D.1.15 D.1.17 Reporting Requirements~~

- (a) A quarterly summary of the information shall be submitted using the reporting form located at the end of this permit, or its equivalent. At a minimum, the report shall contain the information specified in Condition ~~D.1.10~~ **D.1.12**.

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**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-12 and 326 IAC 2-2]**

~~D.1.15 D.1.18 Modifications and Construction: Advance Approval of Permit Conditions~~

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- 14. The following emission units were removed from service and no longer exist at the source: 1) Emission unit ID TK01 (15,500 gallons HCl Holding Tank in Building C39); 2) Emission unit ID TK05 (10,000 gallons -73 Degrees C MACE Tank in Building C68); 3) TK06 (10,000 gallons -53 Degrees C MACE Tank in Building C68); and 4) TKST1 (10,000 gallons Syltherm Tank in Building C64B). The facility description, subsection (b) was amended as shown.
- (b) The following emissions units are not subject to applicable requirements described in this D section, and are listed only for informational purposes.

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control Devices**	Capacity	Units
C24	DFP01*	Diesel Fire Pump	PVC24DFP1		2.15	MMBTU/hr
C24	DFP02*	Diesel Fire Pump	PVC24DFP2		2.15	MMBTU/hr
C44	GEN01*	Emergency Diesel Generator	PVC44GEN1		3.99	MMBTU/hr
C55	GEN01*	Emergency Diesel Generator	PVC55GEN1		1.3	MMBTU/hr
C79	GEN01*	Back-Up Fire Pump Generator	PVC79GEN1		4.86	MMBTU/hr
C23	TK01*	#2 Fuel Oil Storage Tank	PVC23TK1		238,000	Gallons
C24	TK01*	#2 Fuel Oil Storage Tank	PVC24TK1		275	Gallons
<del>C39</del>	<del>TK04*</del>	<del>HCl Holding Tank</del>	<del>PVC39TK4</del>		<del>15,500</del>	<del>Gallons</del>
C79	TK01*	#2 Fuel Oil Storage Tank	PVC79TK1		500	Gallons
C24	TK02*	#2 Fuel Oil Storage Tank	PVC24TK2		275	Gallons
<del>C68</del>	<del>TK05*</del>	<del>-73 Degrees C MACE Tank</del>	<del>PVC68TK5</del>		<del>10,000</del>	<del>Gallons</del>
<del>C68</del>	<del>TK06*</del>	<del>-53 Degrees C MACE Tank</del>	<del>PVC68TK6</del>		<del>10,000</del>	<del>Gallons</del>
<del>C64B</del>	<del>TKST1*</del>	<del>Syltherm Tank</del>	<del>PVC64BTKST1</del>		<del>10,000</del>	<del>Gallons</del>

\* Emissions units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).

\*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

15. Section D.1 of Part 70 Permit No.: 165-6462-00009, issued October 1, 2004, currently does not require the submission of the continuous opacity monitor downtime report. Therefore, the Permittee requested item (d) be added under Condition D.1.15 (now D.1.17) as shown:

**D.1.15 D.1.17 Reporting Requirements**

**(d) The Permittee shall prepare and submit a written report of continuous opacity monitor downtime each calendar quarter. The report must contain the information required by 326 IAC 3-5-7(5).**

16. The Permittee indicated that the maximum throughput for each fermenter (TKF01 through TKF32) is equal to 9.256 tons per hour, and not 9.181 tons per hour as stated in the current permit. The revised figures were provided in the August 20, 1998 amendments, and submitted to IDEM, OAQ but were not reflected in the Part 70 operating permit. Condition D.2.1(a) has been revised as shown.

**D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]**

(a) Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from each fermenter (TKF01 through TKF32) shall not exceed ~~48.4~~ **18.2** pounds per hour based on a maximum throughput of ~~9.181~~ **9.256** tons per hour.

17. Several emission units were incorrectly listed as being subject to the applicable requirements under Section D.3, subsection (a) - Facility Description. There are no applicable requirements described for Emission Unit ID EV002 (9,000 gallons Evaporator), TK407 (15,000 gallons Contents Evaps Cleaning), and TK408 (15,000 gallons Contents Evaps Cleaning) in the current permit. Accordingly, Emission Unit ID EV002, TK407, and TK408 were deleted from the table in Subsection (a) - Facility Description and inserted in the table in Subsection (b) - Facility Description. Furthermore, the Permittee indicated that Emission Unit ID GF109 is a vibratory feeder and not a gravity feeder.

**SECTION D.3 AHM – PRODUCT RECOVERY OPERATIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>						
The information describing the processes contained in these facility description boxes is descriptive information and does not constitute enforceable conditions.						
(a) The following emissions units are subject to applicable requirements described in this D section.						
<b>Bldg.</b>	<b>Unit ID*</b>	<b>Unit Description</b>	<b>Stack/Vent ID</b>	<b>Control**</b>	<b>Capacity</b>	<b>Units</b>
C45A	BL410	RECYCLE BLENDER	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	CENT401B*	CENTRIFUGE	N/A		N/A	N/A
C45A	CENT401C*	CENTRIFUGE	N/A		N/A	N/A
C45A	COS401D	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS420A	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS420L	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS421A*	SCREW CONVEYOR	N/A		N/A	N/A
C45A	COS421L*	SCREW CONVEYOR	N/A		N/A	N/A
C45A	D420	DRYER	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	D421	DRYER	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
<del>C45</del>	<del>EV002</del>	<del>EVAPORATOR</del>	<del>PVC45EV002</del>		<del>9,000</del>	<del>Gallons</del>
C45A	EV450*	EVAPORATOR	PVC45AAC460	Vent Condenser HE450E, Carbon Adsorber CA460**	180	Gallons

C45A	SM410A	SCREW CONVEYOR MIXER	N/A		N/A	N/A
C45	TK370A*	NEW AMYL TANK	PVC45TK370A		38,265	Gallons
C45	TK370B*	NEW AMYL TANK	PVC45TK370B		20,834	Gallons
C45A	TK401*	WASH ALCOHOL HOLDING TANK	PVC45AAC460	Carbon Adsorber CA460**	4,259	Gallons
C45A	TK401G*	STORAGE TANK	PVC45AAC460	Carbon Adsorber CA460**	1,342	Gallons
C45	TK407*	CONTENTS EVAPS CLEANING	PVC45AAC407		45,000	Gallons
C45	TK408*	CONTENTS EVAPS CLEANING	PVC45AAC408		45,000	Gallons
C45A	TK450A*	STORAGE TANK	PVC45AAC460	Carbon Adsorber CA460**	100	Gallons
C45	VS156	TRANSFER BAGHOUSE	PVC45AC156A		N/A	N/A
C45	VS173	TRANSFER BAGHOUSE	PVC45AC173		N/A	N/A
C45	VS174	TRANSFER BAGHOUSE	PVCAC174A/174B		N/A	N/A
C45A	VS400*	TRANSFER BAGHOUSE	PVC45AAC400A		N/A	N/A
C45A	VS420B*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	VS421B*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	VS480A*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45A	VS480B*	TRANSFER BAGHOUSE	PVC45AAC460	Carbon Adsorber CA460**	N/A	N/A
C45	TK350C*	RECYCLED AMYL TANK	PVC45TK350C		20,834	Gallons
C45	TK350D*	RECYCLED AMYL TANK	PVC45TK350D		20,834	Gallons
C45	TK360C*	RECYCLED AMYL TANK	PVC45TK360C		20,834	Gallons
C45	TK361C*	RECYCLED AMYL TANK	PVC45TK361C		20,834	Gallons

\* Emission units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).  
 \*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

(b) The following emissions units are not subject to applicable requirements, and are listed only for informational purposes.

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C45	EV002	EVAPORATOR	PVC45EV002		9,000	Gallons
C45	TK407*	CONTENTS EVAPS CLEANING	PVC45AAC407		15,000	Gallons
C45	TK408*	CONTENTS EVAPS CLEANING	PVC45AAC408		15,000	Gallons
C45	C24*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT114*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT115*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT116*	CENTRIFUGE	N/A		N/A	N/A
C45	CENT117*	CENTRIFUGE	N/A		N/A	N/A
C45	COL201*	DISTILLATION COLUMN	PVC45TK201		2,100	Gallons
C45	COL204*	DISTILLATION COLUMN	PVC45TK204		3,800	Gallons
C45	COL219*	DISTILLATION COLUMN	PVC45TK219		3,800	Gallons
C45	COS109A	SCREW CONVEYOR	PVC45AC140A	Carbon Adsorber CA140	N/A	N/A
C45	COS109B*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS109D*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS109G*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS153*	SCREW CONVEYOR	PVC45COS153	Vent Sock VS153B	N/A	N/A
C45	COS160A*	SCREW CONVEYOR	N/A		N/A	N/A

C45	COS160B*	SCREW CONVEYOR	N/A		N/A	N/A
C45	COS260*	SCREW CONVEYOR	N/A		N/A	N/A
C45	D160/VLS160	DRYER/VAPOR-LIQUID SEPARATOR	PVC45CA140A	Carbon Adsorber CA140	N/A	N/A
C45	D260/VLS260	DRYER/VAPOR-LIQUID SEPARATOR	PVC45CA140A	Carbon Adsorber CA140	N/A	N/A
C45	D16/VS16*	DRYER/TRANSFER BAGHOUSE	PVC45AC016A		N/A	N/A
C45	DP17*	DRUM PACKER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	EV101	EVAPORATOR	PVC45EV101		9,000	Gallons
C45	EV108*	EVAPORATOR	PVC45EV108		1,000	Gallons
C45	EV202*	EVAPORATOR	PVC45EV202		937	Gallons
C45	FIL109	FILTER BELT	PVC45AC140A	Carbon Adsorber CA140	N/A	N/A
C45	<del>GFV</del> F109*	GRAVITY VIBRATORY FEEDER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	H107*	HOPPER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	SCF160*	SCREW CONV. FEEDER	N/A		N/A	N/A
C45	SCF260*	SCREW CONV. FEEDER	N/A		N/A	N/A
C45	SCR17*	SCREENER	PVC45AC18	Baghouse VS18	N/A	N/A
C45	SM109*	SCREW CONV. MIXER	PVC45AC140A	Carbon Adsorber CA140	N/A	N/A
C45	SM153	SCREW CONVEYOR MIXER	PVC45SM153	Vent Sock VS153	N/A	N/A
C45	TK2A*	AMYL & WATER TK	N/A		50	Gallons
C45	TK8A*	PRODUCTION TK EV 202	PVC45ATK008A		3,000	Gallons
C45	TK8B*	PRODUCTION TK EV 202	PVC45ATK008B		3,000	Gallons
C45	TK8C*	RINSE WATER TANK	PVC45ATK008C		3,000	Gallons
C45	TK8D*	RINSE WATER TANK	PVC45ATK008D		3,000	Gallons
C45	TK8E*	RINSE WATER TANK	PVC45ATK008E		3,000	Gallons
C45	TK8F*	CLEANING SOLUTION	PVC45ATK008F		100	Gallons
C45	TK14A*	PROCESS TANK	PVC45TK14A		1,000	Gallons
C45	TK14B*	EVAP. TANK FOR COL 202	PVC45TK14B		1,000	Gallons
C45	TK14C*	PROCESS TANK	N/A		1,000	Gallons
C45	TK14D*	PROCESS TANK	PVC45TK14D		1,000	Gallons
C45	TK18A*	PRODUCTION TANK	PVC45TK18A		1,300	Gallons
C45	TK20*	PRODUCTION TANK	PVC45TK020		300	Gallons
C45	TK21*	SODIUM SLURRY TANK	PVC45AC140A	Carbon Adsorber CA140	1,100	Gallons
C45	TK22*	SODIUM SLURRY TANK	PVC45AC140A	Carbon Adsorber CA140	1,100	Gallons
C45	TK25*	CRYSTALS	PVC45AC140A	Carbon Adsorber CA140	500	Gallons
C45	TK107*	SOLVENT STORAGE TK	N/A		400	Gallons
C45	TK108B*	EVAP. TANK FOR EV 108	N/A		68	Gallons
C45	TK109A*	AMYL & WATER	N/A		300	Gallons
C45	TK109C*	PRODUCTION TANK	PVC45HE109C		432	Gallons
C45	TK114A*	CENTRIFUGE TANK	PVC45AC140A	Carbon Adsorber CA140	470	Gallons
C45	TK114B*	CENTRIFUGE TANK	PVC45AC140A	Carbon Adsorber CA140	470	Gallons
C45A	TK147/VS147*	STORAGE TANK	PVC45AAC147		50	tons
C45A	TK148/VS148*	STORAGE TANK	PVC45AAC148		50	tons
C45	TK149/VS150C*	STORAGE TANK	PVC45AAC149		16,638	kg
C45	TK151	STORAGE TANK	PVC45TK151	Vent Sock VS151A	N/A	N/A
C45	TK152*	MATERIAL HANDLING	PVC45TK152	Vent Sock VS152	N/AV	N/AV

C45	TK153*	MATERIAL HANDLING	PVC45TK153	Vent Sock VS153A	N/AV	N/AV
C45	TK201*	DECANTER FOR COL201	PVC45TK201		3,000	Gallons
C45	TK202C*	PROD. TK FOR EV202	N/A		450	Gallons
C45	TK204*	DECANTER FOR COL204	PVC45TK204		N/A	N/A
C45	TK219*	DECANTER FOR COL219	PVC45TK219		N/A	N/A
C45	TK350B*	STRIPPER FEED TANK	PVC45TK350B		20,834	Gallons
C45	TK360B*	STRIPPER FEED TANK	PVC45TK360B		20,834	Gallons
C45	TK361B*	STRIPPER FEED TANK	PVC45TK361B		20,834	Gallons
C45	TK350A*	DECANTER	PVC45TK350A		20,834	Gallons
C45	TK360A*	DECANTER	PVC45TK360A		38,265	Gallons
C45	TK361A*	DECANTER	PVC45TK361A		38,265	Gallons
C45	TK380*	CLEANING SOLUTION TANK	PVC45TK380		15,000	Gallons
C45	TK381*	CLEANING SOLUTION TANK	PVC45TK381		15,000	Gallons
C45A	TK435U*	GLYCOL RECYCLE TANK	N/A		750	Gallons
C45A	TK490A*	WASTE TANK	PVC45ATK490A		3,500	Gallons
C45A	TK490B*	WASTE TANK	PVC45ATK490B		450	Gallons
C45	VS17*	VACUUM CLEANING BAGHOUSE	PVC45AC17		N/A	N/A
C45	VS172*	TRANSFER BAGHOUSE	PVC45AC172		N/A	N/A
C45	VS107A*	TRANSFER BAGHOUSE	PVC45AC107		N/A	N/A
* Emission units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21). ** Control devices marked with a double asterisk are required to meet an applicable limitation.						

18. For clarification purposes, the Permittee requested Condition D.3.2 be amended to specify the time range to demonstrate compliance with 326 IAC 8-1-6 as shown. The averaging time period or method was not specified in CP #165-1966. The emissions from the carbon adsorber CA460 are currently monitored by a CEMS. When CEMS data is not available, the Permittee uses mass balance calculations to calculate the one-hour block average emission rates.

**D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 [Best Available Control Technology (BACT)] and CP 165-1966, the VOC emissions from BL410, CENT401B, CENT401C, COS401D, COS420A, COS420L, COS421A, COS421L, D420, D421, EV450, SM410A, TK401, TK401G, TK450A, VS400, VS420B, VS421B, VS480A, and VS480B shall be controlled by a carbon adsorber (CA460) with emissions limited to 2.85 pounds per hour.

**Compliance with this VOC limit may be demonstrated using the CEM data based on an hourly rolling average or using the mass balance calculations based on the one-hour block average.**

19. The unit ID of the control equipment for Emission Unit ID COS250A, D250, H208, HM250, SM210A, SM210B, and SS250 under Section D.4, subsection (b) – Facility Description was incorrectly identified as “Baghouse VS005A” instead of “Baghouse VS005B”, and is corrected as shown.

...

(b) The following emissions units are not subject to applicable requirements, and are listed only for informational purposes.

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C47	COS001*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS101*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS101A*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS101B*	SCREW CONVEYOR	N/A		N/A	N/A

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C47E	COS102*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS102A*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS102B*	SCREW CONVEYOR	N/A		N/A	N/A
C47E	COS103*	SCREW CONVEYOR	N/A		N/A	N/A
C47	COS250A*	SCREW CONVEYOR	PVC47AC005B	Baghouse VS005AB	N/A	N/A
C47	D250*	FLUIDIZED BED DRY	PVC47AC005B	Baghouse VS005AB	N/A	N/A
C47	H012*	HOPPER	N/A		N/A	N/A
C47	H002*	HOPPER	N/A		N/A	N/A
C47	H201*	HOPPER	N/A		N/A	N/A
C47	H208*	HOPPER	PVC47AC005B	Baghouse VS005AB	N/A	N/A
C47	H270*	HOPPER	N/A		N/A	N/A
C47	H003*	HOPPER	N/A		N/A	N/A
C47	HM006*	HAMMER MILL	N/A		N/A	N/A
C47	HM008*	HAMMER MILL	N/A		N/A	N/A
C47	HM250*	HAMMER MILL	PVC47AC005B	Baghouse VS005AB	N/A	N/A
C47	SCR006*	SCREENER	N/A		N/A	N/A
C47	SM210A*	RIBBON MIXER	PVC47AC005B	Baghouse VS005-AB	N/A	N/A
C47	SM210B*	RIBBON MIXER	PVC47AC005B	Baghouse VS005-AB	N/A	N/A
C47	SS250*	SCREENERS	PVC47AC005B	Baghouse VS005-AB	N/A	N/A
C47	SUMP003*	WASTE SUMP	N/A		4,283	Gallons
C47	TK001A*	STORAGE TANK	PVC47TK1A	Vent Sock TK1ASOCK	2,009	Cubic Ft.
C47	TK001B*	STORAGE TANK	PVC47TK1B	Vent Sock TK1BSOCK	1,850	Cubic Ft.
C47	TK002*	STORAGE TANK	N/A		80	Tons
C47	TK180*	STORAGE TANK	N/A		N/A	N/A
C47	TK310*	RUBBER LINED TANK	PVC47TK310		500	Gallons
C47E	TK320*	LIQUID WASTE TANK	PVC47TK320		2,400	Gallons
C47	TK320A*	TYLOSIN WASTEWATER TANK	PVC47TK320A		175	Gallons
C47	TK330*	JACKETED TANK	PVC47 TK330		22,000	Gallons
C47	TK340*	TYLOSIN HOT WATER TANK	PVC47TK340		200	Gallons
C47B	TK410A*	STORAGE TANK	N/A		36	Tons
C47B	TK410B*	STORAGE TANK	N/A		36	Tons
C47B	TK453*	WASTE SUMP, PROC. WATER	PVC47TK453		1,000	Gallons
C47	TK006*	TRANSFER TANK	N/A		N/A	N/A
C47E	TK803*	VEGETABLE OIL TANK	N/A		8,000	Gallons
C47E	TK803A*	VEGETABLE OIL TANK	PVC47ETK803A		125	Gallons
C47E	TK804A*	MINERAL OIL TANK	PVC47ETK804A		125	Gallons
C47	VS005B*	TRANSFER BAGHOUSE	PVC47AC005B		N/A	N/A
C47	VS011*	TRANSFER BAGHOUSE	PVC47AC11		N/A	N/A
C47E	VS101*	TRANSFER BAGHOUSE	PVC47EAC101A		N/A	N/A
C47E	VS102*	TRANSFER BAGHOUSE	PVC47EAC102A		N/A	N/A
C47	VS013*	VACUUM CLEANING BAGHOUSE	PVC47AC13		N/A	N/A
C47	VS170A*	VACUUM CLEANING BAGHOUSE	PVC47AC170A		N/A	N/A
C47	VS220*	TRANSFER BAGHOUSE	PVC47AC220		N/A	N/A

Bldg.	Unit ID*	Unit Description	Stack/Vent ID	Control**	Capacity	Units
C47	VS270*	TRANSFER BAGHOUSE	PVC47AC270		N/A	N/A
C47	VS280*	TRANSFER BAGHOUSE	PVC47AC280		N/A	N/A
C47	VS285*	TRANSFER BAGHOUSE	PVC47AC285		N/A	N/A
C47B	VS510*	VACUUM CLEANING BAGHOUSE	PVC47BAC510		N/A	N/A
C47E	VS815D*	VACUUM CLEANING BAGHOUSE	PVC47EAC815D		N/A	N/A
C47C	VS617*	VACUUM CLEANING BAGHOUSE	PVC47CAC617		NA	NA

\* Emission units marked with a single asterisk are insignificant activities as defined in 326 IAC 2-7-1(21).

\*\* Control devices marked with a double asterisk are required to meet an applicable limitation.

20. The Permittee requested revising Condition D.4.6 to provide clarity regarding the continuous monitoring requirement as shown.

**D.4.6 Continuous Emissions Monitoring [326 IAC 2-1.1-11] [326 IAC 3-5]**

The Permittee shall continuously monitor the inlet and outlet VOC concentrations for carbon adsorbers CA520 and CA190. **Continuous monitoring operation is defined as the collection of at least one measurement for each successive 15-minute period.**

21. The Permittee requested Condition D.4.7 be revised as follows:

**D.4.7 Visible Emissions Observations [326 IAC 2-1.1-11]**

The Permittee shall visually observe the emissions from TK103 exhaust while it is operating at least once per day. TK103 is **considered to be operating only when raw materials are being unloaded into the tank.** If abnormal emissions are observed, the Permittee shall follow the Compliance Response Plan as required by Condition C.15.

22. The Permittee requested a revision to Conditions D.4.8(c) and D.4.9 (a) to avoid redundancy with Conditions C.11(h) and (g) as shown.

**D.4.8 Reporting Requirements**

...

(c) Pursuant to 326 IAC 3-5-4, the Permittee shall maintain a complete, written continuous monitoring standard operating procedure (SOP) for the continuous emissions monitors. ~~If revisions are made to the SOP, updates shall be submitted to the department biennially.~~ The CEMS SOP should contain, at a minimum, the items described in 326 IAC 3-5-4(a)."

...

**D.4.9 Record Keeping Requirements**

(a) ~~**Reserved** The Permittee shall prepare and submit a written report of the results of the continuous emissions monitors cylinder gas audit or relative accuracy test audit for each calendar quarter. The report must contain the information required by 326 IAC 3-5-5(e)(2).~~"

23. Section D.5 was revised as shown since the Permittee indicated it will be permanently shutting down of the bulk pharmaceutical manufacturing (BPM) operations.

**SECTION D.5 BULK PHARMACEUTICAL MANUFACTURING (BPM) PRODUCTION OPERATIONS**

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

The information describing the processes contained in the facility description boxes is descriptive information and does not constitute enforceable conditions:

(a) ~~The emission units listed below are subject to applicable requirements described or referred to in this D section. The emission units in the BPM production operations can be generally described as process vessels (tanks), crystallizers, filters, centrifuges, dryers, process scrubber systems, and process~~

~~condenser systems and are referred to as process vents under the National Emission Standards for Hazardous Air Pollutants for Pharmaceutical Production (Pharmaceutical MACT) found at 40 CFR Part 63, Subpart GGG.~~

~~General activities such as open man-way operations, charging a liquid from a drum to a tank, centrifuge emptying operations, drum filling operations, or loading wetcake into dryers may also be defined as process vents. Individual identification of these activities are not listed in the description tables given they are not stationary or continually change. Each of these activity types will follow the requirements outlined in Condition D.5.2 of this permit section for BPM Production Equipment Exhaust Systems.~~

~~Ancillary activities, such as heat exchange systems, are not considered process vents and have not been included in the description tables.~~

**The Permittee permanently shut down the emission units listed in Section D.5.**

...

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

### D.5.1 Standards for BPM Process Vents [40 CFR 63.1254, 326 IAC 2-2-3, and 326 IAC 8-5-3]

#### **Reserved**

~~The following streamlined standards for the BPM process operations satisfy the Maximum Achievable Control Technology Standards for Pharmaceutical Production Operations (Pharmaceutical MACT) for process vents [40 CFR 63.1254], Prevention of Significant Deterioration Best Available Control Technology (PSD-BACT) requirements [326 IAC 2-2-3] and Reasonably Available Control Technology (RACT) requirements for synthesized pharmaceutical manufacturing operations [326 IAC 8-5-3]:~~

- ~~(a) With the exception of Conditions D.5.1(c) and D.5.2, the Permittee shall route the vapors from each operating BPM process vent containing undiluted and uncontrolled process vent streams equal to or greater than 50 ppmv HAP, 50 ppmv VOC, or 15 lb/day of VOC, through a closed-vent system to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and its closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.~~
- ~~(b) The Permittee shall cover all in-process tanks, having an exposed liquid surface containing VOC greater than 15 pounds per day unless sampling, maintenance, or inspection procedures require operator access.~~
- ~~(c) The Permittee is not required to control emissions from BPM process vents in accordance with (a) of this section, if it would result in a safety hazard, as long as the sum of the uncontrolled BPM process vent streams within an individual BPM process does not exceed an annual mass limit of 900 kilograms (2,000 pounds) of HAP per 365-day period and the sum of all uncontrolled process vent emissions generated during the manufacturing of pharmaceutical products do not exceed an annual mass limit of 1,800 kilograms (4,000 pounds) of HAP per 365-day period.~~
- ~~(d) The Permittee shall enclose all centrifuges, rotary vacuum filters, and other filters having an exposed liquid surface, where the liquid contains VOC and exerts a total vapor pressure of 0.5 pounds per square inch or more at 20°C.~~

D.5.2 Control Strategy for BPM Production Equipment Exhaust Systems [40 CFR 63.1254, 326 IAC 2-2-3, and 326 IAC 8-5-3]

---

**Reserved**

- (a) Pursuant to 40 CFR 63.1254, production equipment exhaust systems containing undiluted and uncontrolled exhaust streams with HAP concentrations greater than 50 ppmv HAP shall be routed to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and its closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.
- (b) Pursuant to 326 IAC 8-5-3(b)(2), VOC emissions from production equipment exhaust systems shall not exceed 33 pounds per day. If uncontrolled VOC emissions from a production equipment exhaust system would exceed 33 pounds per day, then the Permittee shall route VOC emissions from that production equipment exhaust system to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and its closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.
- (c) Pursuant to 326 IAC 2-2-3, VOC BACT for production equipment exhaust systems not meeting the criteria of Conditions D.5.2(a) or D.5.2(b) is no controls. If the process affiliated with a production equipment exhaust system that is not routed to the RTO control system is modified in a manner that causes the criteria in Conditions D.5.2(a) or D.5.2(b) to apply, the Permittee shall connect the production equipment exhaust system to the RTO control system before beginning any operations that would cause Conditions D.5.2(a) or D.5.2(b) to be applicable.

D.5.3 Leak Detection and Repair (LDAR) Standards [326 IAC 2-2-3, 326 IAC 8-5-3 and 40 CFR 63.1255]

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**Reserved**

The LDAR standards that apply to components associated with the BPM production operations are described in Section E.1 of this permit.

D.5.4 Heat Exchange System Requirements [326 IAC 2-2-3 and 40 CFR 63.1252(c)(2)]

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**Reserved**

The Permittee shall comply with the following requirements for heat exchange systems that cool process equipment or materials used in pharmaceutical manufacturing operations:

- (a) The heat exchange system shall be treated according to the provisions of 40 CFR 63.104, except that the monitoring frequency shall be no less than quarterly.
- (b) The Permittee shall develop and implement a Heat Exchanger Monitoring Plan for monitoring the affected heat exchange systems. If a substantial leak is identified by methods other than those described in the monitoring plan and the method(s) specified in the plan could not detect the leak, the Permittee shall revise the plan and document the basis for the changes. The Permittee shall complete the revisions to the plan no later than 180 days after discovery of the leak.
- (c) If a leak is detected, the Permittee shall repair the leak as soon as practical but not later than 45 calendar days after the Permittee receives results of monitoring tests indicating a leak. The leak shall be repaired unless the Permittee demonstrates that the results are due to a condition other than a leak. Once the leak has been repaired, the owner or operator shall confirm that the heat exchange system has been repaired, within 7 calendar days of the repair or startup, whichever is later.

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the requirements in 40 CFR 63.104(e)(1) or (e)(2) is met.

- (d) For identifying leaking equipment, the owner or operator of heat exchange systems on equipment which meet current good manufacturing practice (CGMP) requirements of

~~21 CFR Part 211 may elect to use the physical integrity of the reactor as the surrogate indicator of heat exchange system leaks around the reactor in lieu of the monitoring requirements, including the monitoring plan, established in 40 CFR 63.104.~~

D.5.5 Startup, Shutdown and Malfunction Requirements [326 IAC 2-2-3, 40 CFR 63.1259(a)(3), and 40 CFR 63.6(e) and 63.8(c)]

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**Reserved**

~~The NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e) and 63.8(c)] shall be used to satisfy the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].~~

~~(a) Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop an SSM Plan to ensure that processes are operated and maintained in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i), and that all malfunctions are corrected as soon as practicable after their occurrence in order to minimize excess emissions. The SSM Plan shall contain the following information:~~

~~(1) Detailed plans and/or procedures for operating and maintaining the process during periods of SSM; and~~

~~(2) Corrective action program for malfunctioning processes.~~

~~(b) The startup, shutdown and malfunction (SSM) requirements for the RTO control system, and associated closed-vent system, are described in Section D.11 of this permit.~~

**Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.5.6 Testing and Monitoring Requirements

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**Reserved**

~~The testing and monitoring requirements for the RTO control system, and its associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.~~

24. As a result of the Permittee's decision to permanently shut down the BPM production buildings, the record keeping and reporting requirements as described in Conditions D.5.7 and D.5.8 were amended as shown.

D.5.7 Record Keeping and Reporting Requirements

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(a) Record Keeping Requirements

(1) ~~**Reserved RTO Control System Records** - The record keeping and reporting requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.~~

(2) ~~**Reserved Process Records** - The Permittee shall maintain the following records of information and data related to Condition D.5.1(c):~~

~~(A) Daily rolling annual total HAP emissions;~~

~~(B) Number of batches per year for each batch process;~~

~~(C) Standard batch uncontrolled and controlled emissions for each process;~~

~~(D) Actual uncontrolled and controlled emissions for each nonstandard batch; and~~

~~(E) Record whether each batch operated was considered a standard batch.~~

- (3) ~~Reserved Heat Exchange System Records~~ — The Permittee shall maintain the following records for heat exchange systems that use water to cool process equipment or materials used in pharmaceutical manufacturing operations:
- (A) ~~A copy of the Heat Exchanger Monitoring Plan and the results of the quarterly monitoring; or~~
  - (B) ~~If utilizing the CGMP alternative, a copy of maintenance records, including the date, time, and sign off or initials of the individual who completed the task, of all heat exchange systems; and~~
  - (C) ~~Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination; and~~
  - (D) ~~Records of any leaks detected by procedures not included in the Heat Exchanger Monitoring Plan, if applicable, and the date the leak was discovered; and~~
  - (E) ~~The dates of efforts to repair leaks, the method or procedure used to confirm repair of a leak, and the date repair was confirmed; and~~
  - (F) ~~The Permittee shall track the heat exchange systems that use water to cool process equipment or materials used in pharmaceutical manufacturing operations in an operating scenario maintained in the On-Site Implementation Log (OSIL).~~
- (4) ~~Reserved LDAR Records~~ - The record keeping and reporting requirements for the LDAR standards are described in Sections E.1 and E.2 of this permit.
- (5) SSM Records - The Permittee shall maintain the following records **from October 1, 2004 to the date on which BPM production buildings were disconnected from the fume transport system going to the RTO:**

...

(b) ~~Periodic Reporting Requirements~~

- (1) ~~The following streamlined quarterly reporting requirements shall satisfy the Pharmaceutical MACT standards [40 CFR 63.1260(i)] and the PSD BACT requirements [326 IAC 2-1.1-11]:~~
  - (A) ~~SSM summary reports for the processes.~~
- (2) ~~The reporting requirements for the RTO control system, and associated closed-vent system, that controls emissions from the emission units listed in this section are described in Section D.11 of this permit.~~
- (3) ~~The reporting requirements for the LDAR standards are described in Sections E.1 and E.2 of this permit.~~
- (4) ~~All reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.~~

(c) ~~Immediate Reporting Requirements~~

~~The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(c)(3)] shall be used to satisfy the reporting requirements under the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].~~

- (1) ~~Any time an action taken by the Permittee during an SSM event of a process is not consistent with the procedures specified in the SSM Plan, the Permittee shall report the actions taken for that event. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.~~
- (2) ~~Within 7 working days after the end of an SSM event of a process where an action taken by the Permittee is not consistent with the procedures specified in the SSM Plan, the Permittee shall submit a letter containing the following information in accordance with 40 CFR 63.10(d)(5):~~
  - (A) ~~Name, title and signature of responsible official certifying accuracy;~~
  - (B) ~~Explanation of the circumstances for the event;~~
  - (C) ~~Reason for not following the SSM Plan; and~~
  - (D) ~~Report any excess emissions and/or parameter monitoring exceedances that are believed to have occurred.~~

### **Modifications and Construction Requirements [~~326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2~~]**

#### **D.5.8 Modifications and Construction: Advance Approval of Permit Conditions**

- (a) ~~The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.~~
- (b) ~~The Permittee may construct and install new emission units of the types described in this D section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.~~

25. Section D.6 was revised as shown since the Permittee indicated it will be permanently shutting down of the bulk pharmaceutical manufacturing (BPM) operations.

### **SECTION D.6 BPM SUPPORT OPERATIONS – SOLVENT RECOVERY OPERATIONS**

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

The information describing the processes contained in the facility description boxes is descriptive information and does not constitute enforceable conditions:

- (a) ~~The emission units listed below are subject to applicable requirements described or referred to in this D section. The BPM solvent recovery emission units can be generally described as columns, stills, evaporators, accumulators, process condensers and receivers and are referred to as process vents under the National Emission Standards for Hazardous Air Pollutants for Pharmaceutical Production (Pharmaceutical MACT) found at 40 CFR Part 63, Subpart GGG and Off-Site Waste and Recovery Operations (OSWRO) MACT found at 40 CFR Part 63, Subpart DD. The solvent recovery columns may also be defined as treatment units under the OSWRO MACT.~~  
**The Permittee permanently shut down the emission units that were listed in Section D.6.**  
...

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

### D.6.1 Standards for BPM Support Process Vents [40 CFR 63.1254, CFR 63.690, 326 IAC 2-2-3, and 326 IAC 8-5-3]

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#### **Reserved**

~~The following streamlined standards for the BPM solvent recovery operations satisfy the Pharmaceutical MACT Standards for process vents [40 CFR 63.1254], OSWRO MACT Standards for process vents [40 CFR 63.690], PSD BACT requirements [326 IAC 2-2-3] and RACT requirements for synthesized pharmaceutical manufacturing operations [326 IAC 8-5-3]:~~

- ~~(a) — With the exception of Condition D.6.1(c), the Permittee shall route the vapors from each operating BPM process vent containing undiluted and uncontrolled process vent streams equal to or greater than 50 ppmv HAP, 50 ppmv VOC, or 15 lb/day of VOC, through a closed-vent system to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and associated closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.~~
- ~~(b) — The Permittee shall cover all in-process tanks associated with the BPM solvent recovery operations, having an exposed liquid surface containing VOC greater than 15 pounds per day unless production, sampling, maintenance, or inspection procedures require operator access.~~
- ~~(c) — The Permittee is not required to control emissions from BPM Support process vents in accordance with (a) of this section, if it would result in a safety hazard, as long as the sum of the uncontrolled BPM Support process vent streams within an individual BPM process does not exceed an annual mass limit of 900 kilograms (2,000 pounds) of HAP per 365-day period and the sum of all uncontrolled process vent emissions generated during the manufacturing of pharmaceutical products do not exceed an annual mass limit of 1,800 kilograms (4,000 pounds) of HAP per 365-day period.~~
- ~~(d) — The Permittee shall enclose all centrifuges, rotary vacuum filters, and other filters having an exposed liquid surface, where the liquid contains VOC and exerts a total vapor pressure of 0.5 pounds per square inch or more at 20°C.~~

### D.6.2 Treatment Unit Requirements [326 IAC 2-2-3 and 40 CFR 63.684]

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#### **Reserved**

~~When a solvent recovery column is used as the final treatment step to treat off-site waste containing VOHAP or VOC equal to or greater than 500 ppmw, the Permittee shall reduce the VOHAP and VOC concentrations of the off-site material to a level that is less than 500 ppmw to satisfy the requirements of 326 IAC 2-2-3 and 40 CFR 63.684(b).~~

### D.6.3 Leak Detection and Repair (LDAR) for Fugitive Emissions [326 IAC 2-2-3 and 40 CFR 63.1255]

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#### **Reserved**

~~The LDAR standards that apply to components associated with the BPM solvent recovery operations are described in Sections E.1 and E.2 of this permit.~~

### D.6.4 Heat Exchange System Requirements [326 IAC 2-2-3 and 40 CFR 63.1252(c)(2)]

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#### **Reserved**

~~The Permittee shall comply with the following requirements for heat exchange systems that cool process equipment or materials used in pharmaceutical manufacturing operations.~~

- ~~(a) — The heat exchange system shall be treated according to the provisions of 40 CFR 63.104, except that the monitoring frequency shall be no less than quarterly.~~
- ~~(b) — The Permittee shall develop and implement a Heat Exchanger Monitoring Plan for monitoring the affected heat exchange systems. If a substantial leak is identified by methods other than those described in the monitoring plan and the method(s) specified in the plan could not detect the leak, the Permittee shall revise the plan and document the~~

basis for the changes. The Permittee shall complete the revisions to the plan no later than 180 days after discovery of the leak.

- (c) ~~If a leak is detected, the Permittee shall repair the leak as soon as practical but not later than 45 calendar days after the Permittee receives results of monitoring tests indicating a leak. The leak shall be repaired unless the Permittee demonstrates that the results are due to a condition other than a leak. Once the leak has been repaired, the owner or operator shall confirm that the heat exchange system has been repaired, within 7 calendar days of the repair or startup, whichever is later.~~

~~Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the requirements in 40 CFR 63.104(e)(1) or (e)(2) is met.~~

- (d) ~~For identifying leaking equipment, the owner or operator of heat exchange systems on equipment which meet current good manufacturing practice (CGMP) requirements of 21 CFR Part 211 may elect to use the physical integrity of the reactor as the surrogate indicator of heat exchange system leaks around the reactor in lieu of the monitoring requirements, including the monitoring plan, established in 40 CFR 63.104.~~

D.6.5 Startup, Shutdown and Malfunction Requirements [326 IAC 2-2-3, 40 CFR 63.1259(a)(3), 40 CFR 63.697(b)(3), and 40 CFR 63.6(e)(3) and 63.8(c)]

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**Reserved**

~~The NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e) and 63.8(c)] shall be used to satisfy the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)] and PSD BACT requirements [326 IAC 2-1.1-11].~~

- (a) ~~Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop an SSM Plan to ensure that processes are operated and maintained in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i), and that all malfunctions are corrected as soon as practicable after their occurrence in order to minimize excess emissions. The SSM Plan shall contain the following information:~~

~~(1) Detailed plans and/or procedures for operating and maintaining the process during periods of SSM; and~~

~~(2) Corrective action program for malfunctioning processes.~~

- (b) ~~The startup, shutdown and malfunction (SSM) requirements for the RTO control system, and associated closed-vent system, are described in Section D.11 of this permit.~~

**Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.6.6 Testing and Monitoring Requirements

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**Reserved**

- (a) ~~The testing and monitoring requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.~~

- (b) ~~The following streamlined requirements for the solvent recovery columns that treat off-site waste shall satisfy the Offsite Waste MACT standards [40 CFR 63.684(d) and (e)] and the PSD BACT requirements [326 IAC 2-1.1-11]:~~

~~(1) An initial and annual demonstration shall be performed within 30 days after the first time the Permittee begins using the treatment process to manage a new off-site material stream equal to or greater than 500 ppmw VOHAP or VOC in accordance with the requirements of either 40 CFR 63.683(b)(1)(ii) or 63.683(b)(2)(ii).~~

- ~~(2) — The Permittee shall establish solvent recovery column temperature limits for each off-site waste material stream equal to or greater than 500 ppmw VOHAP or VOC. The Permittee shall monitor the temperature as follows:~~
- ~~(A) — The Permittee shall install and operate the temperature CMS in accordance with 40 CFR 63.8(c).~~
- ~~(B) — Each CMS shall be in continuous operation when the solvent recovery column is receiving off-site waste streams equal to or greater than 500 ppmw VOHAP or VOC, except for system malfunctions (breakdowns, out of control periods, and associated repairs), maintenance periods, calibration checks and zero (low-level) and high-level calibration drift adjustments.~~
- ~~(C) — Continuous operation is defined as the collection of at least one measurement for each successive 15-minute period.~~

26. No records related to compliance with Condition D.6.1(c) were required to be maintained by the Permittee. Therefore, Condition D.6.7(a)(3) was deleted. To date, a solvent recovery column has not been used as the final treatment step to treat off-site waste in accordance with Condition D.6.2. Testing and monitoring requirements in accordance with Condition D.6.6(b) are therefore not applicable. Accordingly, no records related to compliance with Conditions D.6.2 and D.6.6(b) were required to be maintained by the Permittee. Therefore, Condition D.6.7(a)(4) was deleted. None of the heat exchange systems have been in operation after the Part 70 operating permit was issued on October 1, 2004. Therefore, no monitoring or repair activities were carried out after October 1, 2004. Therefore, Condition D.6.7(a)(5) was revised. The periodic reporting and immediate reporting requirements for emission units in Section D.6 are no longer applicable. The modification and construction requirements are also no longer applicable. Conditions D.6.7(b), D.6.7(c), and D.6.8 were deleted.

#### D.6.7 Record Keeping and Reporting Requirements

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(a) Record Keeping Requirements

...

(3) **Reserved**

~~Process Records — The Permittee shall maintain the following records of information and data related to Condition D.6.1(c):~~

~~Daily rolling annual total HAP emissions;~~

~~(A) — Number of batches per year for each batch process;~~

~~(B) — Standard batch uncontrolled and controlled emissions for each process;~~

~~(C) — Actual uncontrolled and controlled emissions for each nonstandard batch;  
and~~

~~(D) — Record whether each batch operated was considered a standard batch.~~

(4) **Reserved**

~~Solvent Recovery Records — The Permittee shall track how the solvent recovery columns are being utilized in an operating scenario maintained in the On-Site Implementation Log. If a solvent recovery column is used as a treatment column for offsite waste, then the Permittee shall maintain the following records of information and data related to Conditions D.6.2 and D.6.6(b):~~

~~(A) — Initial and annual demonstration records;~~

~~(B) — Records of all required CMS data;~~

- ~~(C) — Records of each CMS calibration check;~~
  - ~~(D) — Maintenance records for each CMS; and~~
  - ~~(E) — Occurrence/duration records of each CMS malfunction.~~
- (5) Heat Exchange System Records – The Permittee shall maintain the following records **from October 1, 2004 to the date on which BPM solvent recovery buildings were disconnected from the fume transport system going to the RTO** for heat exchange systems that use water to cool process equipment or materials used in pharmaceutical manufacturing operations:
- (A) A copy of the Heat Exchanger Monitoring Plan. ~~and the results of the quarterly monitoring; or~~
  - (B) **Reserved** ~~If utilizing the CGMP alternative, a copy of maintenance records, including the date, time, and sign-off or initials of the individual who completed the task, of all heat exchange systems; and~~
  - (C) **Reserved** ~~Monitoring data indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination; and~~
  - (D) **Reserved** ~~Records of any leaks detected by procedures not included in the Heat Exchanger Monitoring Plan, if applicable, and the date the leak was discovered; and~~
  - (E) **Reserved** ~~The dates of efforts to repair leaks, the method or procedure used to confirm repair of a leak, and the date repair was confirmed; and~~
  - (F) The Permittee shall track the heat exchange systems that use water to cool process equipment or materials used in pharmaceutical manufacturing operations in an operating scenario maintained in the On-Site Implementation Log (OSIL).
- (6) SSM Records - The Permittee shall maintain the following records **from October 1, 2004 to the date on which BPM solvent recovery buildings were disconnected from the fume transport system going to the RTO**:
- (A) Records of the current and superseded versions of SSM Plan.
  - (B) Occurrence/duration records of each process malfunction.
  - (C) Information to demonstrate conformance with each SSM are consistent with the procedures in the SSM Plan.
  - (D) Records of actions taken during each SSM when different from SSM Plan.

~~(b) — Periodic Reporting Requirements~~

- ~~(1) — The following streamlined quarterly reporting requirements shall satisfy the Pharmaceutical MACT standards [40 CFR 63.1260(i)], Offsite Waste MACT [40 CFR 63.697(b)(3)] and the PSD BACT requirements [326 IAC 2-1.1-11]:~~
  - ~~(A) — SSM summary reports for the processes.~~
- ~~(2) — The reporting requirements for the RTO control system, and associated closed-vent system, that control emissions from the emission units listed in this section, are described in Section D.11 of this permit.~~

~~(3) — The reporting requirements for the LDAR standards are described in Sections E.1 and E.2 of this permit.~~

~~(4) — All reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.~~

~~(c) — Immediate Reporting Requirements~~

~~The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the reporting requirements under the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].~~

~~(1) — Any time an action taken by the Permittee during an SSM event of a process is not consistent with the procedures specified in the SSM Plan, the Permittee shall report the actions taken for that event. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.~~

~~(2) — Within 7 working days after the end of an SSM event of a process where an action taken by the Permittee is not consistent with the procedures specified in the SSM Plan, the Permittee shall submit a letter containing the following information in accordance with 40 CFR 63.10(d)(5):~~

~~(A) — Name, title and signature of responsible official certifying accuracy;~~

~~(B) — Explanation of the circumstances for the event;~~

~~(C) — Reason for not following the SSM Plan; and~~

~~(D) — Report any excess emissions and/or parameter monitoring exceedances that are believed to have occurred.~~

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

**D.6.8 — Modifications and Construction: Advance Approval of Permit Conditions**

~~The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.~~

~~The Permittee may construct and install new emission units of the types described in this D section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.~~

27. The entire facility description information given in Section D.7 was deleted and replaced with the following:

**SECTION D.7 BPM SUPPORT OPERATIONS – SOLVENT STORAGE TANK CONDITIONS**

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

**The following information is descriptive information and does not constitute enforceable conditions:**

**The Permittee permanently shut down the emission units that were listed in Section D.7.**

28. Section D.7 was revised as shown since the Permittee indicated it will be permanently shutting down of the bulk pharmaceutical manufacturing (BPM) solvent storage tank operations.

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

- D.7.1 Standards for BPM Solvent Storage Tanks [40 CFR 63.1253(c)(1)(i), 40 CFR 60.112b and 60.113b, 326 IAC 8-5-3, and 326 IAC 2-2]

**Reserved**

~~The following streamlined standards for the BPM solvent storage tanks satisfy the requirements of the Pharmaceutical MACT Standards for storage tanks [40 CFR 63.1253(c)(1)(i)], Volatile Organic Liquid Storage Vessel Standards [40 CFR 60.112b and 60.113b], PSD BACT requirements [326 IAC 2-2-3] and RACT requirements for synthesized pharmaceutical manufacturing operations [326 IAC 8-5-3]:~~

~~(a) — Definition Standards:~~

- ~~(1) — A BPM solvent storage tank is defined as any vessel designed to store raw material feedstocks or used solvent to be recovered that contain VOCs and/or VOHAP. Pressure vessels greater than 204.9 kPa without emissions to the atmosphere, vessels attached to motor vehicles, or vessels used to store beverage alcohol are not BPM solvent storage tanks. For purposes of inspections in Section D.7.1(c), a BPM solvent storage tank includes any fixed roof, cover, and/or enclosure, and closed-vent system section from the BPM solvent storage tank to the inlet of the production building roof fan exhausting to the control device or to the BPM solvent storage tank conservation vent.~~

~~(b) — Operational Standards:~~

- ~~(1) — The Permittee shall route the vapors from each operating BPM solvent storage tank through a closed-vent system to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and associated closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.~~
- ~~(2) — Solvent storage tanks shall be of fixed-roof design.~~

~~(c) — Inspection Standards:~~

- ~~(1) — The Permittee shall conduct one-time Method 21 inspections of the fixed roof for each existing BPM solvent storage tank not operated under negative pressure and not already subject to LDAR within 150 days of the issuance date of this permit, and for each new BPM solvent storage tank not operated under negative pressure and not subject to LDAR within 150 days upon startup.~~
- ~~(2) — The Permittee shall conduct semiannual visual inspections on each BPM solvent storage tank for visible, audible, or olfactory indications of leaks.~~
- ~~(3) — The Permittee shall initiate repair of any leak on a BPM solvent storage tank no later than 5 calendar days after identification, and complete the repair within 15 days after identification, unless:~~

~~(A) — The repair is technically infeasible without a shutdown of an operation or process; or~~

~~(B) — It is determined that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair.~~

~~Repairs delayed due to either of the causes described in (A) or (B) shall be completed by the end of the next shutdown.~~

#### D.7.2 Exceptions to Standards for BPM Solvent Storage Tanks [40 CFR 63.1253 and 326 IAC 2-2]

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**Reserved**

~~(a) — The BPM solvent storage tanks are not subject to the standards established in Condition D.7.1(b) during periods of planned routine maintenance, as long as the planned routine maintenance activities do not exceed 240 hours per year.~~

~~(b) — BPM solvent storage tanks storing VOC/VOHAP with a vapor pressure less than 3.5 kPa are not subject to the requirements of Conditions D.7.1(b)(1) and D.7.1(c).~~

~~(c) — BPM solvent storage tanks that are unsafe or difficult to monitor are not subject to the requirements of Condition D.7.1(c).~~

#### D.7.3 Leak Detection and Repair (LDAR) Standards [40 CFR 63.1255 and 326 IAC 2-2]

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**Reserved**

~~The LDAR standards that apply to components associated with the emission units listed in this section are described in Section E.1 of this permit.~~

#### D.7.4 Startup, Shutdown and Malfunction Requirements [40 CFR 63.1259(a)(3), 326 IAC 2-2-3, 40 CFR 63.6(e) and 40 CFR 63.8(c)]

---

**Reserved**

~~The NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e) and 63.8(c)] shall be used to satisfy the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].~~

~~(a) — Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop an SSM Plan to ensure that processes are operated and maintained in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i), and that all malfunctions are corrected as soon as practicable after their occurrence in order to minimize excess emissions. The SSM Plan shall contain the following information:~~

~~(1) — Detailed plans and/or procedures for operating and maintaining the process during periods of SSM; and~~

~~(2) — Corrective action program for malfunctioning processes.~~

~~(b) — The startup, shutdown and malfunction (SSM) requirements for the RTO control system are described in Section D.11 of this permit.~~

### Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.7.5 Testing and Monitoring Requirements

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**Reserved**

~~The testing and monitoring requirements for the RTO control system, and associated closed vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.~~

29. Even though some of the solvent storage tanks identified in the facility description in Section D.7 remained in operation after the Part 70 Permit No.: 165-6462-00009 was issued on October 1, 2004, they were all exempt from the requirements of Condition D.7.1(c) – Inspection Standards, because

these units stored VOC/VOHAP with a vapor pressure less than 3.5 kPa. Accordingly, the Permittee was not required to maintain any records for visual inspection or one-time Method 21 inspections. Therefore, Conditions D.7.6 is revised as shown.

#### D.7.6 Record Keeping and Reporting Requirements

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(a) Record Keeping Requirements

...

- (2) Inspection and Maintenance Records - The Permittee shall maintain the following records **from October 1, 2004 to the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers** of information and data related to Conditions D.7.1 and D.7.2:

...

- (C) ~~Reserved~~ Visual inspection log of BPM solvent storage tanks, including the date of inspection and a statement that no leaks were detected, if applicable;
- (D) ~~Reserved~~ One-time Method 21 inspection log of each BPM solvent storage tank, including the date of inspection and a statement that no leaks were detected, if applicable;
- (E) ~~Reserved~~ Information on each BPM solvent storage tank inspection during which a leak is detected, including:
- (i) ~~Instrument identification numbers, operator name or initials, and identification of the equipment;~~
  - (ii) ~~Date the leak was detected and the date of the first attempt to repair the leak;~~
  - (iii) ~~Maximum instrument reading measured after leak is successfully repaired or determined to be nonrepairable;~~
  - (iv) ~~Reason for any delay of repair if leak not repaired within 15 calendar days after discovery of the leak;~~
  - (v) ~~Name, initials, or other form of identification of person whose decision it was that repair could not be effected without a shutdown;~~
  - (vi) ~~Expected date of successful repair of leak if leak not repaired within 15 calendar days after discovery of leak;~~
  - (vii) ~~Dates of shutdowns that occur while the equipment is unrepaired; and~~
  - (viii) ~~Date of successful repair of the leak.~~

...

- (3) SSM Records - The Permittee shall maintain the following records **from October 1, 2004 to the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers**:

...

- (5) Storage Tank Records – Pursuant to New Source Performance Standard for Volatile Organic Liquid Storage Vessels [40 CFR 60.116b(a) and (b)], the

Permittee shall, ~~for the life of the source~~ **until the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers**, keep readily accessible records of the dimensions and capacity for each BPM solvent storage tank.

- (6) Operating Plan – Pursuant to 40 CFR 60.115b, the Permittee shall, ~~for the life of the source~~ **until the date on which BPM solvent storage tanks were disconnected from the fume transport system going to the regenerative thermal oxidizers**, maintain a copy of the operating plan required by 40 CFR 60.113b for all tanks with design capacity greater than or equal to 75 cubic meters.

~~(b) Periodic Reporting Requirements~~

- ~~(1) The following streamlined quarterly reporting requirements shall satisfy the Pharmaceutical MACT standards [40 CFR 63.1260(g), (i), and (j)] and the PSD BACT requirements [326 IAC 2-1.1-11]:~~

~~(A) Inspections conducted during which a leak was detected;~~

~~(B) Periods of planned routine maintenance; and~~

~~(C) SSM summary reports for the processes.~~

- ~~(2) The reporting requirements for the RTO control system, and associated closed-vent system, used to control emissions from the emission units listed in this section are described in Section D.11 of this permit.~~

- ~~(3) The reporting requirements for the LDAR standards are described in Section E.1 of this permit.~~

- ~~(4) Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.~~

~~(c) Immediate Reporting Requirements~~

~~The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the reporting requirements under the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)] and PSD BACT requirements [326 IAC 2-1.1-11].~~

- ~~(1) Any time an action taken by the Permittee during an SSM event of the process is not consistent with the procedures specified in the SSM Plan, the Permittee shall report the actions taken for that event. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.~~

- ~~(2) Within 7 working days after the end of an SSM event of the process where an action taken by the Permittee is not consistent with the procedures specified in the SSM Plan, the Permittee shall submit a letter containing the following information in accordance with 40 CFR 63.10(d)(5):~~

~~(A) Name, title and signature of responsible official certifying accuracy;~~

~~(B) Explanation of the circumstances for the event;~~

~~(C) Reason for not following the SSM Plan; and~~

~~(D) Report any excess emissions and/or parameter monitoring exceedances that are believed to have occurred.~~

**Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

**D.7.7 Modifications and Construction: Advance Approval of Permit Conditions**

The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

The Permittee may construct and install new emission units of the types described in this D section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

30. The Permittee is permanently shutting down the BPM production buildings and several of the BPM support operations, described under Section D.8 - waste tanks, are no longer operating, Tanks C3-TK-25, C13-TK-501, C13-TK-60, C13-TK-61, C13A-TK-502, and C63-TK-207 are no longer connected to the RTO and are designated for demolition. In addition, C63-TK-209 has been removed. Also, several waste tanks C3-TK-245, C63-TK-30, C63-TK-31, C63-TK-32, C63-TK-33, C64B-TK-13, and C64F-TK-1 may still be considered as operating from Resource Conservation and Recovery Act (RCRA) perspective, but are no longer used to store waste or VOC/VOHAP with a vapor pressure greater than 3.5 kPa. These tanks are no longer connected to the RTO will not be considered operating from a RCRA perspective and are designated for demolition. Therefore, these units have been removed from the permit as follows:

**SECTION D.8 BPM SUPPORT OPERATIONS – WASTE TANK CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
<i>Building C3:</i>				
C3-TK-245	Waste Tank	PVC70A/BSCBR1/2	4,000 gal	RTO
<del>C3-TK-25</del>	<del>Waste Tank</del>	<del>PVC70A/BSCBR1/2</del>	<del>4,000 gal</del>	<del>RTO</del>
<i>Building C13:</i>				
C13-TK-501	Waste Tank	PVC70A/BSCBR1/2	1,600 gal	RTO
C13-TK-60	Waste Tank	PVC70A/BSCBR1/2	200 gal	RTO
C13-TK-61	Waste Tank	PVC70A/BSCBR1/2	1,000 gal	RTO
<i>Building C13A:</i>				
C13A-TK-502	Waste Tank	PVC70A/BSCBR1/2	1,600 gal	RTO
<i>Building C63:</i>				
C63-TK-207	Waste Tank	PVC70A/BSCBR1/2	7,000 gal	RTO
<del>C63-TK-209</del>	<del>Waste Tank</del>	<del>PVC70A/BSCBR1/2</del>	<del>19,500 gal</del>	<del>RTO</del>
C63-TK-30	Waste Tank	PVC70A/BSCBR1/2	1,600 gal	RTO
C63-TK-31	Waste Tank	PVC70A/BSCBR1/2	1,600 gal	RTO
C63-TK-32	Waste Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
C63-TK-33	Waste Tank	PVC70A/BSCBR1/2	2,000 gal	RTO
<i>C64 Tank Modules:</i>				
C64B-TK-13	Waste Tank	PVC64BTK013	30 gal	RTO

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
C64F-TK-1	Waste Tank	PVC64FTK001	58 gal	RTO
<i>C9 Tank Farm:</i>				
C9-TK-1	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-2	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-3	Waste Tank	PVC70A/BSCBR1/2	42,000 gal	RTO
C9-TK-4	Waste Tank	PVC70A/BSCBR1/2	42,000 gal	RTO
C9-TK-6A	Waste Tank	PVC9BTK6A	1,900 gal	N/A
C9-TK-9	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-10	Waste Tank	PVC70A/BSCBR1/2	72,000 gal	RTO
C9-TK-11	Waste Tank	PVC70A/BSCBR1/2	10,000 gal	RTO
C9-TK-12	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-13	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-14	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-15	Waste Tank	PVC70A/BSCBR1/2	30,000 gal	RTO
C9-TK-16	Waste Tank	PVC70A/BSCBR1/2	10,000 gal	RTO
C9-TK-17	Waste Tank	PVC70A/BSCBR1/2	10,000 gal	RTO
C9-TK-19	Waste Tank	PVC70A/BSCBR1/2	248,000 gal	RTO
C9-TK-20	Waste Tank	PVC70A/BSCBR1/2	376,000 gal	RTO

31. Because of the Permittee's decision to permanently shut down the BPM production and several of the BPM support operations, Condition D.8.1, D.8.2, and D.8.3 were revised as shown. 326 IAC 8-5-3 is no longer an applicable requirement, and was deleted in Condition D.8.1.

D.8.1 Standards for ~~BPM~~ Waste Storage Tanks [40 CFR 63.1256(b), 40 CFR 63.685, 40 CFR 60.110b, 326 IAC 2-2-3, and ~~326 IAC 8-5-3~~]

The following streamlined standards for ~~BPM~~ waste storage tanks satisfy the requirements of the Pharmaceutical MACT Standards for wastewater tanks [40 CFR 63.1256(b)], Volatile Organic Liquid Storage Vessel Standards [40 CFR 60.110b], OSWRO MACT Standards for waste tanks [40 CFR 63.685], **and** PSD BACT requirements [326 IAC 2-2-3], ~~and RACT requirements for synthesized pharmaceutical manufacturing operations [326 IAC 8-5-3]:~~

(a) Definition Standards:

(1) A ~~BPM~~-waste storage tank is defined as any waste management unit that is designed to contain an accumulation of **affected wastewater or offsite** waste material containing VOCs and/or VOHAP. Pressure vessels greater than 204.9 kPa without emissions to the atmosphere or vessels attached to motor vehicles are not ~~BPM~~-waste storage tanks. For purposes of inspections in Condition D.8.1(c), ~~BPM~~-waste storage tank includes any fixed roof, cover, and/or enclosure, and closed vent system section from the ~~BPM~~ waste storage tank to the ~~inlet of the production building roof fan exhausting to the control device or waste storage tank conservation vent.~~

(b) Operational Standards:

(1) The Permittee shall route the vapors from each operating ~~BPM~~ waste storage tank through a closed-vent system to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and associated

closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit.

- (2) ~~BPM w~~Waste storage tanks shall be of fixed-roof design.

(c) Inspection Standards:

- (1) The Permittee shall conduct one-time Method 21 inspections on each new fixed roof ~~BPM~~ waste storage tank not operated under negative pressure and not subject to LDAR within 150 days upon startup.
- (2) The Permittee shall conduct semiannual visual inspections on the fixed roof and all openings of each ~~BPM~~ waste storage tank for visible, audible, or olfactory indications of leaks.
- (3) The Permittee shall initiate repair of any leak on a ~~BPM~~ waste storage tank no later than 5 calendar days after identification, and complete the repair within 15 days after identification, unless:

...

32. On May 13, 2005, EPA published in 70 FR 25670, amendments to 40 CFR 63.1256(b). In accordance with 40 CFR 63.1256(b)(10) of the amended rule, waste storage tanks are not subject to the standards established in Condition D.8.1(b) – Operational Standards, during periods of planned routine maintenance, as long as the planned routine maintenance activities do not exceed 240 hours per year.

IDEM, OAQ is aware of this change in 40 CFR 63.1256(b). However, since the requirements in Condition D.8.2 were established in T165-6462-00009, issued on October 1, 2004 as part of the PSD BACT requirements, changes in the BACT requirements will require re-evaluation of the PSD BACT for these tanks. The requirements of Condition D.8.2 cannot be changed without applying a Part 70 Significant Source Modification (SSM), pursuant to 326 IAC 2-7-10.5 (f)(1). Therefore, the proposed changes to Condition D.8.2 will not be made in this Part 70 significant permit modification.

For clarification purposes, Condition D.8.2 and D.8.3 have been revised as follows:

D.8.2 Exceptions to Standards for ~~BPM~~ Waste Storage Tanks [40 CFR 63.1256(b), 40 CFR 63.685, and 326 IAC 2-2-3]

- (a) The ~~BPM~~ waste storage tanks less than 38 cubic meters are not subject to the standards established in Condition D.8.1(b) during periods of planned routine maintenance, as long as the planned routine maintenance activities do not exceed 240 hours per year.
- (b) ~~BPM w~~Waste storage tanks storing VOC/VOHAP with a vapor pressure less than 3.5 kPa and tanks with a capacity less than 40 cubic meters that are used to store wastewater with a vapor pressure less than 76.6 kPa where the wastewater is generated only from stormwater or drips, leaks or spills from non-process equipment, are not subject to the requirements of Conditions D.8.1(b)(1) and D.8.1(c).
- (c) ~~BPM w~~Waste storage tanks that are unsafe or difficult to monitor are not subject to the requirements of Condition D.8.1(c).

D.8.3 Leak Detection and Repair (LDAR) Standards [40 CFR Part 61, Subpart V and 326 IAC 2-2-3]

The LDAR standards that apply to components associated with the ~~BPM~~ waste storage tanks are described in Section E.2 of this permit.

33. Condition D.8.6 was revised to delete the reference to “BPM”. Also, the first sentence of Condition D.8.6(c)(1) was revised as follows to make it consistent with the regulatory requirements in 40 CFR 63.6(e)(3):

## D.8.6 Record Keeping and Reporting Requirements

---

### (a) Record Keeping Requirements

...

#### (2) Inspection and Maintenance Records - The Permittee shall maintain the following records of information and data related to Conditions D.8.1(c) and D.8.2:

(A) Identification and explanation of all **BPM** waste storage tanks unsafe to inspect, including a plan for when these tanks will be inspected;

(B) Identification and explanation of all **BPM** waste storage tanks difficult to inspect, including a plan for when these tanks will be inspected;

(C) Visual inspection log of **BPM** waste storage tanks, including the date of inspection and a statement that no leaks were detected, if applicable;

(D) One-time Method 21 inspection log of each **BPM** waste storage tank, including the date of inspection and a statement that no leaks were detected, if applicable;

(E) Information on each **BPM** waste storage tank inspection during which a leak is detected, including:

...

(G) Records of **BPM** waste storage tanks storing VOC/VOHAP with a vapor pressure less than 3.5 kPa.

...

#### (5) Storage Tank Records - Pursuant to New Source Performance Standard for Volatile Organic Liquid Storage Vessels [40 CFR 60.116b(a) and (b)], the Permittee shall, for the life of the source, keep readily accessible records of the dimensions and capacity for all applicable **BPM** waste storage tanks.

...

### (c) Immediate Reporting Requirements

The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the reporting requirements under the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].

#### (1) Any time an action taken by the Permittee during an SSM event of a process is not consistent with the procedures specified in the SSM Plan **and the SSM event results in an exceedance of a relevant emission standard**, the Permittee shall report the actions taken for that event. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.

...

34. All references to BPM in Section D.9 were deleted. Under the Facility Description, the phrase "defined as containing VOC/VOHAP" was revised to "defined as containing affected wastewater or offsite waste material containing VOC/VOHAP". In Conditions D.9.1(a)(1) and D.9.2(a)(1), the phrase "defined as any portable unit containing VOC/VOHAP material" was revised to "defined as any portable unit containing affected wastewater or offsite waste material containing VOC/VOHAP". In Condition D.9.2(b)(2), the words "BPM liquid waste" was revised to "affected wastewater or offsite liquid waste".

**SECTION D.9 BPM SUPPORT OPERATIONS – WASTE CONTAINER CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
The information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:				
Emission Unit ID	Emission Unit Description	Stack/Vent	Nominal Capacity	Control Device
<b>SMALL BPM WASTE CONTAINERS*:</b>				
A small BPM waste container, such as a drum, is defined as containing <b>affected wastewater or offsite waste material containing</b> VOC/VOHAP and having a capacity greater than 0.1 cubic meters (26.4 gallons) and equal to or less than 0.42 cubic meters (110.5 gallons). Identification of these types of containers have not been individually listed given they are portable and continually change. Each onsite wastewater container and offsite waste container with this description type will follow the requirements outlined in this section.				
<b>LARGE BPM WASTE CONTAINERS*:</b>				
A large BPM waste container, such as tanker or melon, is defined as containing VOC/VOHAP and having a capacity greater than 0.42 cubic meters (110.5 gallons). Identification of these types of containers have not been individually listed given they are portable and continually change. Each container with this description type will follow the requirements outlined in this section.				
* Emission units marked with an asterisk are insignificant activities as defined by 326 IAC 2-7-1(21)(A) through (C).				

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

**D.9.1 Standards for Small BPM Waste Containers [40 CFR 63.1256(d), 40 CFR 63.688, 326 IAC 2-2-3]**

The following streamlined standards for small BPM waste containers satisfy the requirements of the Pharmaceutical MACT Standards for wastewater containers [40 CFR 63.1256(d)], OSWRO MACT Standards for waste containers [40 CFR 63.688], and PSD BACT requirements [326 IAC 2-2-3]:

- (a) Definition Standards:
  - (1) A small BPM waste container is defined as any portable unit containing **affected wastewater or offsite waste material containing** VOC/VOHAP material at concentrations greater than 500 ppmw with a storage capacity of greater than 0.1 cubic meters (26.4 gallons) and less than or equal to 0.42 cubic meters (110.5 gallons).
- (b) Operational Standards:
  - (1) The cover and all openings on each BPM waste container shall be maintained in the closed position, except when adding material, removing material, accessing material for non-transfer-related routine activities, openings caused from a pressure relief device, or opening of a safety device.
  - (2) Each BPM waste container containing VOC/VOHAP shall meet existing Department of Transportation (DOT) specifications and testing requirements under 49 CFR Part 178.

...

D.9.2 Standards for Large BPM Waste Containers [40 CFR 63.1256(d), 40 CFR 63.688, 326 IAC 2-2-3]

The following streamlined standards for large BPM waste containers satisfy the requirements of the Pharmaceutical MACT Standards for wastewater containers [40 CFR 63.1256(d)], OSWRO MACT Standards for waste containers [40 CFR 63.688], and PSD BACT requirements [326 IAC 2-2-3]:

(a) Definition Standards:

- (1) A large BPM waste container is defined as any portable unit containing **affected wastewater or offsite waste material containing VOC/VOHAP material** at concentrations greater than 500 ppmw with a storage capacity of greater than 0.42 cubic meters (110.5 gallons).

(b) Operational Standards:

- (1) The cover and all openings on each large BPM waste container shall be maintained in the closed position, and without leaks, except when adding material, removing material, accessing material for non-transfer-related routine activities, opening from a pressure relief device, and opening of a safety device.
- (2) A submerged fill pipe shall be used when pumping **BPM affected wastewater or offsite** liquid waste into a large BPM waste container. The submerged fill pipe outlet shall extend to no more than 6 inches or within two fill pipe diameters of the bottom of the container while the container is being filled.

...

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3), 40 CFR Part 63 Subpart GGG, 40 CFR Part 63 Subpart DD]**

D.9.3 Record Keeping and Reporting Requirements

(a) Record Keeping Requirements

The Permittee shall maintain the following records for inspections required by Conditions D.9.1 and D.9.2:

...

- (3) Visual inspection log of BPM waste containers, including the date of inspection and a statement that no leaks were detected, if applicable;
- (4) One-time Method 21 inspection log of each large BPM waste container, including the date of inspection and a statement that no leaks were detected, if applicable;
- (5) Information on each BPM waste container inspection during which a leak is detected, including:

...

35. The Permittee requested the facility description under Section D.10 be deleted and replaced with the following to clarify that the drain system listed in this section is still in existence but is no longer in operation:

...

**SECTION D.10 BPM SUPPORT OPERATIONS – INDIVIDUAL DRAIN SYSTEM CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>				
<p>The <b>following</b> information describing the processes contained in the following facility description boxes is descriptive information and does not constitute enforceable conditions:</p> <p>The <del>emission units listed below are subject to applicable requirements described or referred to in this D section. These sumps are defined as individual drain systems under the National Emission Standards for Hazardous Air Pollutants for Pharmaceutical Production (Pharmaceutical MACT) found at 40 CFR Part 63, Subpart GGG.</del></p>				
Unit ID	Unit Description	Stack/Vent	Nominal Capacity	Control Device
<i>Building 63:</i>				
2 <sup>nd</sup> floor drain system*	Drains	N/A	N/A	Water Seals
* Emission units marked with an asterisk are insignificant activities as defined by 326 IAC 2-7-1(21)(A) through (C).				
<b>The Permittee permanently shut down the emission unit that was listed in Section D.10.</b>				

36. Conditions D.10.1 through D.10.3 were revised as shown:

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

D.10.1 BPM Individual Drain System (IDS) Standards [40 CFR 63.1256(e), 40 CFR 63.689(b), and 326 IAC 2-2-3]

**Reserved**

~~The following streamlined standards for BPM IDSs satisfy the requirements of the Pharmaceutical MACT Standards for individual drain systems [40 CFR 63.1256(e)], OSWRO MACT Standards for transfer systems [40 CFR 63.689(b)], and PSD BACT requirements [326 IAC 2-2-3]:~~

~~(a) — Definition Standards:~~

~~(1) — A BPM IDS is defined as any stationary system used to convey affected wastewater streams of HAP and/or VOC, as defined in Condition D.14.1(c), to a waste management unit. A segregated stormwater sewer system, which is a drain and collection system designed and operated for the sole purpose of collecting rainfall runoff at a facility, and which is segregated from all other individual drain systems, is excluded from this definition. An IDS that is used for the sole purpose of collecting wastewater from drips, spills and leaks, or water from safety showers, condensation and fire deluge systems, is excluded from this definition. For purposes of inspections in Section D.10.1(c), IDS includes any fixed roof, cover, and/or enclosure, and closed vent system section from the IDS to the inlet of the production building roof fan exhausting to the control device or to the IDS conservation vent.~~

~~(a) — Operational Standards:~~

~~(1) — The Permittee shall cover the openings of each operating BPM IDS containing waste equal to or greater than 500 parts per million by weight (ppmw) HAP and/or 500 ppmw VOC at all times during use except when it is necessary to use the opening for sampling or removal of material, or for equipment inspection, maintenance, or repair; or~~

- (1) ~~The Permittee shall route the vapors from each operating BPM IDS containing waste equal to or greater than 500 ppmw HAP and/or 500 ppmw VOC through a closed-vent system to the RTO control system. The operation, inspection and maintenance requirements for the RTO control system, and associated closed-vent system, used to control emissions from these emission units are described in Section D.11 of this permit; or~~
- (2) ~~The Permittee shall equip the drain of each operating BPM IDS containing waste equal to or greater than 500 ppmw HAP and/or 500 ppmw VOC with water seal controls or a tightly fitting cap or plug. If a water seal is used on a drain receiving affected wastewater, the Permittee shall either extend the pipe discharging the wastewater below the liquid surface in the water seal of the receiving drain, or install a flexible shield (or other enclosure which restricts wind motion across the open area between the pipe and the drain) that encloses the space between the pipe discharging the wastewater to the drain receiving the wastewater. Water seals which are used on hubs receiving wastewater that is not subject to the provisions of this subpart for the purpose of eliminating cross ventilation to drains carrying affected wastewater are not required to have a flexible shield or extended subsurface discharging pipe.~~

(b) ~~Inspection Standards:~~

- (1) ~~For each BPM IDS containing waste equal to or greater than 500 ppmw HAP and/or 500 ppmw VOC, the Permittee shall perform the following visual inspections and, when necessary, comply with the following repair requirements:~~
  - (A) ~~Initial and semiannual visual inspections of each BPM IDS for improper work practices such as leaving open any access hatch or other opening when such hatch or opening is not in use for sampling or removal, or for equipment inspection, maintenance, or repair.~~
  - (B) ~~Initial and semiannual visual inspections of each BPM IDS for control equipment failures such as a cracked or broken joint, lid, cover, or door.~~
  - (C) ~~Initiate repair of any leak no later than 5 calendar days after identification, and complete repair within 15 days after identification, except for the following allowances for delay of repair:~~
    - (i) ~~Repair is technically infeasible without a shutdown;~~
    - (ii) ~~Emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. In such cases, repair shall occur by the end of the next shutdown;~~
    - (iii) ~~Equipment is emptied or is no longer used to treat waste equal to or greater than 500 ppmw HAP and/or VOC; or~~
    - (iv) ~~Unavailability of parts beyond the control of the Permittee.~~
- (2) ~~For each BPM IDS containing waste equal to or greater than 500 ppmw HAP and/or 500 ppmw VOC and not operated under negative pressure, the Permittee shall perform the following additional inspections and, when necessary, comply with the following repair requirements:~~
  - (A) ~~Initial one time Method 21 inspection on the cover of each BPM IDS. For new equipment, this inspection shall be performed within 150 days upon startup of the new equipment.~~
  - (B) ~~Semiannual visual inspections for visible, audible, or olfactory indications of leaks.~~

~~(C) — Initiate repair of any leak no later than 5 calendar days after identification, and complete repair within 15 days after identification, except for the following situations:~~

~~(i) — Delay of repair is allowed if the repair is technically infeasible without a shutdown; or~~

~~(ii) — Delay of repair is allowed if the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair.~~

~~(3) — For each BPM IDS equipped with a water seal, the Permittee is not subject to the requirements in Conditions D.10.1(c)(1) and (2), but instead shall ensure that the water seal is maintained on a semiannual basis. For example, a flow-monitoring device indicating positive flow from a main to a branch water line supplying a trap or water being continuously dripped into the trap by a hose could be used to verify flow of water to the trap. Visual observation is also an acceptable alternative.~~

~~(4) — BPM IDSs containing waste equal to or greater than 500 ppmw HAP and/or 500 ppmw VOC that are unsafe or difficult to monitor are not subject to the requirements of Conditions D.10.1(c)(1) and (2).~~

D.10.2 Startup, Shutdown and Malfunction Requirements [40 CFR 63.1259(a)(3), 40 CFR 63.697(b)(3), 326 IAC 2-2-3, 40 CFR 63.6(e) and 40 CFR 63.8(c)]

---

**Reserved**

~~The NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e) and 63.8(c)] shall be used to satisfy the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)] and PSD BACT requirements [326 IAC 2-1.1-11].~~

~~(a) — Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop an SSM Plan to ensure that processes are operated and maintained in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i), and that all malfunctions are corrected as soon as practicable after their occurrence in order to minimize excess emissions. The SSM Plan shall contain the following information:~~

~~(1) — Detailed plans and/or procedures for operating and maintaining the process during periods of SSM; and~~

~~(2) — Corrective action program for malfunctioning processes.~~

~~(b) — The startup, shutdown and malfunction (SSM) requirements for the RTO control system, and associated closed vent system, are described in Section D.11 of this permit.~~

**Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.10.3 Testing and Monitoring Requirements

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**Reserved**

~~(a) — The testing and monitoring requirements for the RTO control system, and associated closed vent system, if being utilized to control emissions from a BPM IDS, are described in Section D.11 of this permit.~~

~~(b) — The Permittee shall utilize engineering knowledge of the waste stream constituents such as material balances to demonstrate the average VOHAP and/or VOC concentration is less than 500 ppmw for each BPM IDS that is not controlled in accordance with Condition D.10.1(b).~~

37. After the Part 70 Permit No.: 165-6462-0009 was issued on October 1, 2004 the Permittee did not have any individual drain systems that were controlled by RTOs. Also, no inspection and maintenance activities were carried out after October 1, 2004, as the individual drain system was not in operation. The Permittee did not have any BPM IDS covers that were unsafe or difficult to inspect. Therefore, Condition D.10.4 was revised as shown. Conditions D.10.5 and D.10.6 were deleted.

#### D.10.4 Record Keeping and Reporting Requirements

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(a) Record Keeping Requirements

- (1) ~~Reserved RTO Control System Records~~ – The record keeping requirements for the RTO control system, and associated closed-vent system, that control emissions from the emission units listed in this section are described in Section D.11 of this permit.
- (2) ~~Reserved Inspection and Maintenance Records~~ – The Permittee shall maintain the following records of information and data related to Condition D.10.1:
- (A) ~~Identification and explanation of all BPM IDS covers unsafe to inspect, including a plan for when these IDS covers will be inspected;~~
  - (B) ~~Identification and explanation of all BPM IDS covers difficult to inspect, including a plan for when these IDS covers will be inspected;~~
  - (C) ~~Visual inspection log of BPM IDSs, including the date of inspection and a statement that no leaks were detected, if applicable;~~
  - (D) ~~One time Method 21 inspection log of each BPM IDS cover, including the date of inspection and a statement that no leaks were detected, if applicable;~~
  - (E) ~~Information on each BPM IDS cover inspection during which a leak is detected, including:~~
    - (i) ~~Instrument identification numbers, operator name or initials, and identification of the equipment;~~
    - (ii) ~~Date the leak was detected and the date of the first attempt to repair the leak;~~
    - (iii) ~~Maximum instrument reading measured after leak is successfully repaired or determined to be nonrepairable;~~
    - (iv) ~~Reason for any delay of repair if leak not repaired within 15 calendar days after discovery of the leak;~~
    - (v) ~~Name, initials, or other form of identification of person whose decision it was that repair could not be effected without a shutdown;~~
    - (vi) ~~Expected date of successful repair of leak if leak not repaired within 15 calendar days after discovery of leak;~~
    - (vii) ~~Dates of shutdowns that occur while the equipment is unrepaired; and~~
    - (viii) ~~Date of successful repair of the leak.~~
  - (F) ~~Documentation of a decision to use a delay of repair due to unavailability of parts shall include a description of the failure, the reason additional time~~

was necessary (including a statement of why replacement parts were not kept onsite and when delivery from the manufacturer is scheduled), and the date when the repair was completed.

- (3) SSM Records - The Permittee shall maintain the following records **from October 1, 2004 to the date on which the Permittee decided to permanently shut-down the individual drain system operations:**

- (A) Records of the current and superseded versions of SSM Plan.
- ~~(B) Occurrence/duration records of each process malfunction.~~
- ~~(C) Information to demonstrate conformance with each SSM are consistent with the procedures in the SSM Plan.~~
- ~~(D) Records of actions taken during each SSM when different from SSM Plan.~~

- ~~(4) IDS Waste Stream Records - The Permittee shall identify each IDS not controlled according to the requirements of Condition D.10.1(b) and maintain documentation to support the average waste stream VOHAP and/or VOC concentration are less than 500 ppmw.~~

~~(b) Periodic Reporting Requirements~~

- ~~(1) The following streamlined quarterly reporting requirements shall satisfy the Pharmaceutical MACT standards [40 CFR 63.1260(i) and (j)] and the PSD BACT requirements [326 IAC 2-1.1-11]:~~

- ~~(A) Inspections conducted during which a leak was detected; and~~
- ~~(B) SSM summary reports for the processes.~~

- ~~(2) The reporting requirements for the RTO control system, and associated closed-vent system, that control emissions from the emission units listed in this section are described in Section D.11 of this permit.~~

- ~~(3) Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.~~

~~(c) Immediate Reporting Requirements~~

~~The reporting requirements in the NESHAP General Provisions for Startup, Shutdown and Malfunction (SSM) Plans [40 CFR 63.6(e)(3)] shall be used to satisfy the reporting requirements under the Pharmaceutical MACT standards [40 CFR 63.1259(a)(3)], Offsite Waste MACT standards [40 CFR 63.697(b)(3)], and PSD BACT requirements [326 IAC 2-1.1-11].~~

- ~~(1) Any time an action taken by the Permittee during an SSM event of a process is not consistent with the procedures specified in the SSM Plan, the Permittee shall report the actions taken for that event. The immediate report shall be submitted to the agency via a telephone call or facsimile within 2 working days after commencing actions inconsistent with the plan.~~

- ~~(2) Within 7 working days after the end of an SSM event of a process where an action taken by the Permittee is not consistent with the procedures specified in the SSM Plan, the Permittee shall submit a letter containing the following information in accordance with 40 CFR 63.10(d)(5):~~

- ~~(A) Name, title and signature of responsible official certifying accuracy;~~

- (B) — Explanation of the circumstances of the event;
- (C) — Reason for not following the SSM Plan; and
- (D) — Report any excess emissions and/or parameter monitoring exceedances that are believed to have occurred.

### **Modifications and Construction Requirements [326 IAC 2-7-10.5, 326 IAC 2-7-12 and 326 IAC 2-2]**

#### **D.10.5 Modifications and Construction: Advance Approval of Permit Conditions**

- (a) — The Permittee may modify any existing emission units listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.
- (b) — The Permittee may construct and install new emission units of the types described in this D section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this D section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.

### **Non-Applicability of Requirements**

#### **D.10.6 Non-Applicability Determinations [326 IAC 8-5-3]**

The control requirements of the Synthesized Pharmaceutical RACT rules (326 IAC 8-5-3) do not apply to the individual drain systems identified above in the Facility Description section because the potential to emit VOC emissions from each facility is less than the rule applicability threshold level of 6.8 kilograms per day (15 pounds per day).

38. As a result of the shutting down the BPM production buildings and removing the operating requirements for equipment and processes in the BPM production buildings, parts of the closed-vent system from the outlet of the production roof fans exhausting to the RTO fume transport system and ending at the entrance of the RTO control system are no longer operational. The Permittee requested to revise the Facility Description in Section D.11 as follows:

### **SECTION D.11 BPM CONTROL SYSTEMS – RTO OPERATIONS**

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

The information describing the processes contained in the following facility description is descriptive information and does not constitute enforceable conditions:

The RTO control system consists of two Regenerative Thermal Oxidizers, identified as RTO1 and RTO2, each equipped with caustic scrubbing systems, and each exhausting to individual stacks.

The closed-vent system (CVS) associated with the RTO control system begins at the outlet of the production building roof fans exhausting to the RTO fume transport system and at the outlet side of the tank conservation vents of those tank modules exhausting to the RTO fume transport system and ends at the entrance of the RTO control system.

39. As a result of the Permittee's decision to permanently shut down the BPM production and several of the BPM support operations, 40 CFR 63.1253(b), (c) and (d), 40 CFR 63.1254(a) and (c), 40 CFR 63.1256(e), 40 CFR 63.689(b), and 326 IAC 8-5-3(b) are no longer applicable requirements, and

were deleted from Condition D.11.1. Accordingly, Condition D.11.1(a) was revised. The Leak Detection and Repair (LDAR) conditions for BPM process system components in Section E.1 are no longer applicable to the source. In Condition D.11.1(b)(1)(A), the words "if not subject to the LDAR requirements established in Section E.1 of this permit" was deleted. In addition, Condition D.11.1(b)(2), 40 CFR 63.1253(b) and (c), and 40 CFR 63.689(b) are no longer applicable requirements, and were deleted.

D.11.1 Control Device and Closed-Vent System Standards [~~40 CFR 63.1253(b), (c), and (d), 63.1254(a) and (e), 40 CFR 63.1256(b), (e), and (h), 63.1258(b), 40 CFR 63.685(c) and (d), 63.689(b), 63.690(b), 63.693(f), 40 CFR 60.112b(a) and 60.113b(c), 326 IAC 2-2-3, and 326 IAC 8-5-3(b)~~]

(a) RTO Control Device Standards – The RTO control device standards shall apply at all times the unit is burning waste fume streams, except as provided in Condition D.11.2(a)(2):

...

(4) Volatile Organic Compounds (VOC)/Volatile Organic Hazardous Air Pollutant (VOHAP) – In order to satisfy the Pharmaceutical MACT requirements [40 CFR ~~63.1253(b), (c), and (d), 63.1254(a) and (e), and 63.1256(b), (e) and (h), and 63.1258(b)~~], the Offsite Waste and Recovery Operations MACT requirements [40 CFR 63.685(c) and (d), ~~63.689(b), 63.690(b), and 63.693(f)~~], the PSD BACT requirements [326 IAC 2-2-3], ~~the Synthetic Pharmaceutical MACT requirements [326 IAC 8-5-3(b)], and the New Source Performance Standards for Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.112b(a) and 60.113b(c)]~~, the Permittee shall meet one of the following streamlined VOC/VOHAP emission standards:

...

(5) Hydrogen Halide/Halogen and Fluorides – In order to satisfy the Pharmaceutical MACT requirements [40 CFR ~~63.1253(b), (c), and (d), 63.1254(a) and (e), 63.1256(b), (e) and (h), and 63.1258(b)~~] and PSD BACT requirements for fluorides [326 IAC 2-2-3], the Permittee shall meet one of the following hydrogen halide and halogen emission standards:

...

(b) RTO Closed-Vent System Inspection Standards – The following inspection standards shall apply to the RTO closed-vent system (CVS), except as provided in Condition D.11.2(b):

(1) The Permittee shall comply with the following closed-vent system inspection requirements to satisfy the Pharmaceutical MACT requirements [40 CFR 63.1256(b)(3) ~~and (e)(1)~~, and 63.1258(h)], the Offsite Waste MACT requirements [40 CFR 63.685(g), ~~63.689(b), 63.690(b), 63.693(b) and (c), and 63.695(c)~~], and the PSD BACT requirements [326 IAC 2-2-3]:

(A) Initial one-time Method 21 inspections shall be conducted on new portions of the RTO closed-vent system not operated under negative pressure within 150 days after startup, ~~if not subject to the LDAR requirements established in Section E.1 of this permit.~~

...

(2) The Permittee shall monitor each bypass line on the RTO closed-vent system to satisfy the Pharmaceutical MACT requirements [40 CFR 63.1252(b), ~~63.1253(b) and (e)~~, and 63.1258(b)], the Offsite Waste MACT requirements [40 CFR 63.685(g), ~~63.689(b), 63.690(b), and 63.693(c)~~], and the PSD BACT requirements [326 IAC 2-2-3] using one of the following methods:

...

40. As a result of the Permittee's decision to permanently shut down the BPM production and several of the BPM support operations, in Condition D.11.2(a), 326 IAC 8-5-3 is no longer an applicable requirement, and was deleted from Condition D.11.2(a) as shown.

D.11.2 Exceptions to RTO Control System Standards [40 CFR 63.1260(g), 40 CFR 63.6(e)(3) and 63.8(c), 40 CFR 63.681, 63.685(g) and 63.693(b), 326 IAC 2-2-3, and ~~326 IAC 8-5-3~~]

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- (a) Exceptions to RTO Control Device Operational Standards – The following streamlined standards satisfy the Pharmaceutical MACT standards [40 CFR 63.1260(g)], Offsite Waste MACT standards [40 CFR 63.681, 63.685(g) and 63.693(b)] and PSD BACT requirements [326 IAC 2-2-3], and ~~Synthesized Pharmaceutical Manufacturing RACT requirements [326 IAC 8-5-3]:~~
- (1) The Permittee may open a safety device and vent directly to the atmosphere at any time conditions require it to do so to avoid unsafe conditions.
  - (2) The provisions of Conditions D.11.1(a) shall not apply during periods of startup, shutdown or malfunction that preclude the Permittee from complying with Condition D.11.1(a), provided the Permittee complies with the provisions of the startup, shutdown, and malfunction plan (SSM Plan) required by Condition D.11.3.
- (b) Exceptions to RTO Closed-Vent System Inspection Standards – The following streamlined standards satisfy the Pharmaceutical MACT standards [40 CFR 63.1258(h)(6) and (7)], and PSD BACT requirements [326 IAC 2-2-3]:
- (1) The Permittee is not required to inspect if unsafe or difficult to inspect.

41. As a result of the Permittee's decision to permanently shut down the BPM production and several of the BPM support operations, in Condition D.11.5, 40 CFR 63.1257(c) is no longer an applicable requirement, and was deleted as shown.

D.11.5 Performance Testing Requirements [40 CFR 60.113b(c), 40 CFR 63.7, 40 CFR 63.1257(b), ~~(c)~~, and (d) and 63.1258(b)(3), 40 CFR 63.693(f), 326 IAC 3-6-3(c), and 326 IAC 2-1.1-11]

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- (a) Initial Comprehensive Performance Test Requirements:
- (1) VOC/VOHAP – Initial testing was performed on October 1 and 3, 2002 to satisfy requirements for the Pharmaceutical MACT standards [40 CFR 63.1257(b), ~~(c)~~, and (d) and 63.1258(b)]. These tests shall also satisfy the Offsite Waste MACT standards [40 CFR 63.693(f)], Volatile Organic Liquid Storage Vessel requirements [40 CFR 60.113b(c)], PSD BACT requirements [326 IAC 2-1.1-11], and emission testing requirements for MACT sources [326 IAC 3-6-3(c)].

42. In Condition D.11.7, "40 CFR 63.1258(b)(6)" was revised to "40 CFR 63.1258(b)(7)", to correctly identify the applicable requirement.

D.11.7 Excursions [40 CFR 63.1258(b)(~~6~~7), 40 CFR 63.695(e)(4), 326 IAC 2-1.1-11]

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...

43. In Condition D.12.1(c), the regulatory citation was revised from "40 CFR 63.1206(b)(5)(ii) and (iii)" to "40 CFR 63.1206(b)(5)(i), (ii) and (iii)".

D.12.1 General Applicability Requirements with Emission Standards [326 IAC 2-2-3 and 40 CFR Part 63, Subparts DD and EEE]

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...

- (c) Pursuant to the HWC MACT standards [40 CFR 63.1206(b)(5)(**i**), (ii) and (iii)] and the PSD requirements [326 IAC 2-2-3], the Permittee may make a change in the design, operation, or maintenance practices documented in the comprehensive performance test plan (CPT plan), Documentation of Compliance (DOC), Notification of Compliance (NOC), or startup, shutdown, and malfunction plan (SSM plan). The requirements for changes affected by HWC MACT are described in Condition F.1.13.

44. The Permittee requested to revise Condition D.12.2 to delete the words "...averaged over a three-run performance test..." because the emission standard is applicable at all times and it is only during the comprehensive performance test that the compliance with the emission standard is demonstrated based on an average over a three-run performance test. Similarly, D.12.5(f)(1) was amended as shown

D.12.2 Particulate Matter Emission Standards [40 CFR 63.1203]

In order to satisfy the HWC MACT standards [40 CFR 63.1203(a)(7)], the particulate matter (PM) emissions from the TO3/TO4 liquid waste incinerators stack exhaust, ~~averaged over a three-run performance test~~, shall not exceed 34 milligrams per dry standard cubic meter (mg/dscm) [0.015 grains per dry standard cubic foot (gr/dscf)], corrected to 7 percent oxygen.

D.12.5 Hazardous Air Pollutant (HAP) and Fluoride Emission Standards [40 CFR 63.1203 and 326 IAC 2-2-3]

...

- (f) Principal Organic Hazardous Constituents (POHCs) – In order to satisfy the HWC MACT standards [40 CFR 63.1203(c)(1) and (2)], the Permittee shall comply with the following requirements:

- (1) The destruction and removal efficiency (DRE) for each principal organic hazardous constituent (POHC), excluding dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027, ~~averaged over a three-run DRE test~~, shall be at least 99.99 percent.

...

45. The Permittee requested the addition of the following item (f) under Condition D.12.8 as follows:

"(f) The following exceptions are allowed for the operation of the AWFCO system as specified in Condition D.12.8(a):

- (1) If primary waste is not being burned as indicated by the position of the primary waste feed block valve(s), the Permittee may exceed the operating parameter limit for primary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the secondary waste feed.
- (2) If secondary waste is not being burned as indicated by the position of the secondary waste feed block valve(s), the Permittee may exceed the operating parameter limit for secondary waste atomizing media pressure specified in Condition D.12.16(a)(2)(B), without triggering an AWFCO of the primary waste feed."

The proposed language for exception is not listed under 40 CFR 63, Subpart EEE specifically. Therefore, IDEM will not include such exceptions in the revised permit.

46. The Permittee requested Condition D.12.14(a) be revised as shown. Furthermore, Condition D.12.14 (a) was revised to require commencement of the initial comprehensive performance tests within 6 months of the compliance date for both TO3 and TO4 liquid waste incinerators unless the Permittee's request to waive the initial performance test is granted by U.S. EPA Region 5.

In addition, the Permittee requested the requirements of 40 CFR 63.1207(l) be included as Condition D.12.14(a)(11) to list the steps that the Permittee shall follow when the emissions exceed the emission standards specified in 40 CFR 63, Subpart EEE.

D.12.14 Performance Test Requirements [40 CFR 63.1207, 326 IAC 2-1.1-11, 326 IAC 3-6]

...

- (a) Initial Comprehensive Performance Test Requirements:

- (1) ~~Until U.S. EPA Region 5 makes a final decision on the~~**Unless the** Permittee's requests **U.S. EPA Region 5** to waive the initial comprehensive performance test **and its request is granted**, ~~for the TO3 liquid waste incinerator, a single~~ comprehensive performance tests will be performed on **both TO3 and TO4** liquid waste incinerators, ~~and the data collected from the TO4 test will be applied to TO3.~~
- (2) The Permittee shall commence initial comprehensive performance tests within 6 months of the compliance date for the **TO3 and TO4** liquid waste incinerators, unless an extension is granted pursuant to 40 CFR 63.1207(e)(3) **or if U.S. EPA Region 5 grants Permittee's request to waive the initial comprehensive performance test.**
- (3) If the U.S. EPA Region 5 does not approve the Permittee's request to waive the initial comprehensive performance test ~~for the TO3 liquid waste incinerator~~, and instead requires the Permittee to perform additional performance testing ~~for the TO3 liquid waste incinerator~~, the Permittee shall submit the required notification(s) and complete the additional performance testing within an acceptable schedule, ~~which will be established upon final determination of Permittee's request by U.S. EPA Region 5.~~
- (4) The Permittee shall submit a notification of the performance test and CMS performance evaluation and submit a comprehensive performance test plan at least one (1) year in advance of the intended performance test date(s) for the **TO3 and TO4** liquid waste incinerators.  
...
- (11) **Pursuant to 40 CFR 63.1207(l), if the Permittee determines that it has exceeded an emission standard during the initial comprehensive performance test for a particular mode of operation:**
  - (A) **It must immediately cease burning hazardous waste under that mode of operation.**
  - (B) **Hazardous waste may only be burned for the purpose of pre-testing or comprehensive performance testing under revised operating conditions, and only for a maximum of 720 hours, unless the Permittee obtains written approval for a petition submitted in accordance with 40 CFR 63.1207(l)(3).**
  - (C) **It must conduct a comprehensive performance test under revised operating conditions and submit a Notification of Compliance within 90 days of completion of comprehensive performance test.**

**These submittal requirements satisfy the reporting requirements of 326 IAC 3-6 as allowed under extension provisions of 326 IAC 3-6-4(b).**
  - (D) **Comply with all operating requirements specified in the NOC in lieu of the limits specified in the revised operating conditions that were established for pre-testing or comprehensive performance testing, upon postmark of the NOC.**

47. The Permittee requested the following corrections to Condition D.12.15(b)(3):

- (a) Condition D.12.15(b)(3)(A), the words "scrubber liquid flow rates" should be revised to "scrubber liquid to gas ratios" (see the monitoring requirements in Condition D.12.16(a)(3)(D)); and

- (b) Condition D.12.15(b)(3)(B), the words “combustion air flow rate” should be revised to “flue gas flow rate” (see the monitoring requirements in Condition D.12.16(a)(1)(B)).

These requests are consistent with the monitoring requirements in 40 CFR 63.1209. Therefore, Condition D.12.15(b) has been revised as follows:

D.12.15 Continuous Emissions Monitoring Systems (CEMS) Operating Requirements [40 CFR 63.1209, 40 CFR 63.8, 326 IAC 3-5, 326 IAC 2-1.1-11, 40 CFR Part 60, Appendix B, and 40 CFR Part 60, Appendix F]

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...

- (b) SO<sub>2</sub> and NO<sub>x</sub> CEMS Operation Requirements – The following requirements shall apply when the TO3/TO4 incinerators are burning waste and represent the PSD BACT requirements for SO<sub>2</sub> and NO<sub>x</sub> [326 IAC 2-1.1-11] and the emission monitoring requirements for PSD sources [326 IAC 3-5-1(d)]:

...

- (3) The Startup, Shutdown, and Malfunction (SSM) Plan required by Condition D.12.12(b) shall include procedures for monitoring and recording the following information during times of SO<sub>2</sub> or NO<sub>x</sub> CEMS malfunction:

- (A) When the SO<sub>2</sub> CEMS malfunctions, the Permittee shall monitor and record the equivalent differential pressure across the Hydro-Sonic™ scrubber, polishing scrubber pressure drop, scrubber liquid ~~flow rates to gas ratios~~, polishing scrubber liquid pH, and the condenser/absorber liquid pH as required by Condition D.12.16(a)(3)(C), Condition D.12.16(a)(5)(E), Condition D.12.16(a)(3)(D)~~(F)~~, Condition D.12.16(a)(5)(C), and Condition D.12.16(a)(5)(F), respectively.
- (B) When the NO<sub>x</sub> CEMS malfunctions, the Permittee shall monitor and record the combustion chamber temperature, ~~combustion air~~ **flue gas** flow rate, and primary and secondary waste feed rates as required by Condition D.12.16(a)(1), and if the NO<sub>x</sub> CEMS malfunctions for greater than six continuous hours, assess the NO<sub>x</sub> emissions, using waste testing, waste shipment, and/or process knowledge to determine whether the quantity of nitrogen fed into the incinerator during that time could have exceeded the worst case 24-hour daily average nitrogen feed rate of 1,650 pounds per hour that formed the basis of the NO<sub>x</sub> BACT limit.

48. The Permittee requested Condition D.12.16(a) be revised as shown below to incorporate the operating parameter limits for the TO3 liquid waste incinerator in the Notification of Compliance (NOC) that was approved by IDEM, OAQ on July 28, 2005. The NOC for TO4, submitted on August 21, 2006, has not been approved by IDEM. Therefore, the operating parameter limits for TO4 are not included in the revised permit.

The Permittee decided not to develop a site-specific model and continued calculating the equivalent differential pressure across the Hydro-Sonic™ scrubber using the equation that is provided in Condition D.1.12(a)(3)(C). Therefore, the language related to the submittal of the site-specific model has been removed from Condition D.12.16(a)(3)(C).

Also, in accordance with an alternative monitoring petition which was submitted by the Permittee and approved by U.S. EPA Region 5 on September 13, 2004, Condition D.12.16(a)(5)(I) was revised to allow the Permittee to set the minimum liquid feed rate to the minimum recommended by the manufacturer.

Condition D.12.16 has been revised as follows to incorporate the above proposed changes:

D.12.16 Parametric Continuous Monitoring Systems (CMS) Requirements [40 CFR 63.8(c), 40 CFR 63.1209, and 326 IAC 2-1.1-11]

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(a) The Permittee shall operate the following CMSs in accordance with the quality assurance requirements specified in 40 CFR 63.1209(d) at all times the TO3/TO4 incinerators are in operation. To satisfy the HWC MACT standards [40 CFR 63.1209(b), (d), (e), (f), and (h)] and the requirements for PSD sources [326 IAC 2-1.1-11] the following parameters shall be monitored at all times the TO3/TO4 incinerators are in operation. In addition, **except as stated in Conditions D.12.16(e), (f), and (g)**, the operating parameters monitored by the following CMSs shall not exceed the established operating parameter limits at all times incinerators are burning waste.

(1) Dioxin/Furan CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(k)], the Permittee shall install and operate CMS monitors for the following parameters:

(A) Combustion Chamber Temperature - Minimum hourly rolling average combustion chamber temperature established from the average temperature measured during the three DRE test runs;

**For TO3 liquid waste incinerator, the hourly rolling average combustion chamber temperature shall not be lower than 1,906 °F.**

(B) Flue Gas Flow Rate - Maximum hourly rolling average flue gas flow rate established from the average of the maximum hourly rolling average for each performance test run;

**For TO3 liquid waste incinerator, the hourly rolling average flue gas flow rate shall not exceed 16,046 standard cubic feet per minute, on a wet basis.**

(C) Primary Waste Feed Rate - Maximum hourly rolling average primary waste feed rate as established from the average of the maximum hourly rolling average for each performance test run; ~~and~~.

**For TO3 liquid waste incinerator, the hourly rolling average primary waste feed rate shall not exceed 6,030 pounds per hour.**

(D) Secondary Waste Feed Rate - Maximum hourly rolling average secondary waste feed rate as established from the average of the maximum hourly rolling average for each performance test run.

**For TO3 liquid waste incinerator, the hourly rolling average secondary waste feed rate shall not exceed 17,001 pounds per hour.**

(2) DRE Standard CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(j)], the Permittee shall install and operate CMS monitors for the following parameters:

(A) Those parameters identified in Condition D.12.16(a)(1).

(B) Minimum hourly rolling average atomizing media pressure, established based on manufacturer's recommendations.

**For TO3 liquid waste incinerator, the hourly rolling average primary waste atomizing media pressure shall not be lower than 60 pounds per square inch, gauge.**

In addition, the Permittee shall establish limits on the following parameters. These data collection activities do not require continuous monitoring systems.

- (C) Maximum primary waste feed viscosity, established based on manufacturer's recommendations. The primary waste feed viscosity shall be monitored through periodic analysis of the primary waste feed, as specified in the Permittee's Feedstream Analysis Plan.

**For TO3 liquid waste incinerator, the primary waste feed viscosity shall not exceed 460 centipoise.**

- (D) Maximum secondary waste feed viscosity, established based on manufacturer's recommendations. The secondary waste feed viscosity shall be monitored through periodic analysis of the secondary waste feed, as specified in the Permittee's Feedstream Analysis Plan.

**For TO3 liquid waste incinerator, the secondary waste feed viscosity shall not exceed 460 centipoise.**

- (3) Metals CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(l) and (n)], the Permittee shall install and operate CMS monitors for the following parameters:

- (A) Waste Feed Rate - Maximum 12-hour rolling average feed rates for total Hg, semi-volatile metals (cadmium and lead) and low volatile metals (arsenic, beryllium, and chromium) in all waste feedstreams established from the average of the hourly rolling averages for each performance test run and approved extrapolation techniques;

- (i) **For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for total Hg shall not exceed 0.0040 pounds per hour.**

- (ii) **For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for semi-volatile metals (cadmium and lead) shall not exceed 0.10 pounds per hour.**

- (iii) **For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for low volatile metals (arsenic, beryllium, and chromium) shall not exceed 0.30 pounds per hour.**

- (B) Scrubber Liquids Solid Content -

- (i) Condenser/Absorber - Maximum 12-hour rolling average density of the condenser/absorber sump liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.

**For TO3 liquid waste incinerator, the 12-hour rolling average density of the condenser/absorber sump liquid shall not exceed 8.367 pounds per gallon.**

- (ii) Hydro-Sonic™ Scrubber 1st Stage - Maximum 12-hour rolling average density of the demister sump liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.

**For TO3 liquid waste incinerator, the 12-hour rolling average density of the demister sump liquid shall not exceed 8.361 pounds per gallon.**

- (iii) Polishing Scrubber - Maximum 12-hour rolling average density of the polishing scrubber liquid using a continuous monitoring system established from the average of the performance test run averages. This parameter does not apply to mercury.

**For TO3 liquid waste incinerator, the 12-hour rolling average density of the polishing scrubber liquid shall not exceed 8.494 pounds per gallon.**

- (C) Hydro-Sonic™ Scrubber Pressure Drop - Minimum hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber established from the average of the performance test run averages and based on the following equation:

$$\text{Equivalent dP} = (\text{Measured dP}) + [(3 \times 10^{-11}) \times (\text{Steam Rate})^3] - [(4 \times 10^{-7}) \times (\text{Steam Rate})^2] + 0.0026 \times (\text{Steam Rate})$$

The Permittee may develop a site-specific model to calculate the equivalent differential pressure. The site-specific model should be submitted to the U.S. EPA Region 5 **for approval. The site-specific model can be used for demonstrating compliance with the operating parameter limit on equivalent differential pressure only after approval by U.S. EPA Region 5** within 240 days from the date of the performance test on the TO4 liquid waste incinerator.

**For TO3 liquid waste incinerator, the hourly rolling average equivalent differential pressure across the Hydro-Sonic™ scrubber shall not be lower than 68 inches of water column.**

- (D) Scrubber Liquid to Gas Ratio -
- (i) Hydro-Sonic™ Scrubber 1<sup>st</sup> Stage – Minimum hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage free jet nozzle established from the average of the performance test run averages.

**For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 1<sup>st</sup> stage free jet nozzle shall not be lower than 0.00999 (gallons per minute) per (standard cubic feet per minute), wet basis.**

- (ii) Hydro-Sonic™ Scrubber 2<sup>nd</sup> Stage – Minimum hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle established from the average of the performance test run averages.

**For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid to gas ratio at the 2<sup>nd</sup> stage free jet nozzle shall not be lower than 0.00593 (gallons per minute) per (standard cubic feet per minute), wet basis.**

- (E) ~~Flue Gas Flow Rate – Maximum hourly rolling average flue gas flow rate established from the average of the maximum hourly rolling average for each performance test run.~~

(4) PM CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(m)], the Permittee shall install and operate CMS monitors for the following parameters:

- (A) Those parameters identified in Condition D.12.16(a)(3)(B), (C), (D), and (E); and
- (B) Ash Feed Rate - Maximum 12-hour rolling average ash feed rate established from the average of the test run averages.

**For TO3 liquid waste incinerator, the 12-hour rolling average ash feed rate shall not exceed 1,861 pounds per hour.**

(5) HCl/Cl<sub>2</sub> and Fluorides CMS Requirements – Pursuant to the HWC MACT standards [40 CFR 63.1209(o)] and monitoring requirements for PSD sources [326 IAC 2-1.1-11], the Permittee shall install and operate CMS monitors for the following parameters:

- (A) Those parameters identified in Condition D.12.16(a)(3)(C) and (D);
- (B) Waste Feed Rate - Maximum 12-hour rolling average feed rates for chlorine (organic and inorganic) in all waste feedstreams established from the average of the performance test run averages. [40 CFR 63.1209(o)(1)]

**For TO3 liquid waste incinerator, the 12-hour rolling average feed rate for chlorine shall not exceed 2,632 pounds per hour.**

- (C) Polishing Scrubber Liquid pH - Minimum hourly rolling average polishing scrubber liquid pH established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]

**For TO3 liquid waste incinerator, the hourly rolling average polishing scrubber liquid pH shall not be lower than 4.6.**

- (D) Polishing Scrubber Liquid Feed Pressure – Minimum hourly rolling average polishing scrubber liquid feed pressure established from manufacturer's specifications.

**For TO3 liquid waste incinerator, the hourly rolling average polishing scrubber liquid feed pressure shall not be lower than 6.8 pounds per square inch, gauge.**

- (E) Polishing Scrubber Pressure Drop – Minimum hourly rolling average pressure drop across the polishing scrubber established from manufacturer's specifications. [40 CFR 63.1209(o)(3)(ii)]

**For TO3 liquid waste incinerator, the hourly rolling average pressure drop across the polishing scrubber shall not be lower than 2.3 inches of water column.**

- (F) Condenser/Absorber Liquid pH – Minimum hourly rolling average condenser/absorber liquid pH established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]

**For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid pH shall not be lower than 4.1.**

- (G) Condenser/Absorber Liquid Feed Pressure – Minimum hourly rolling average condenser/absorber liquid feed pressure established from manufacturer's specifications. [40 CFR 63.1209(o)(3)(iii)]

**For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid feed pressure shall not be lower than 8 pounds per square inch, gauge.**

- (H) Condenser/Absorber Pressure Drop – Minimum hourly rolling average pressure drop across the condenser/absorber established from manufacturer's specifications. [40 CFR 63.1209(o)(3)(ii)]

**For TO3 liquid waste incinerator, the hourly rolling average pressure drop across the condenser/absorber shall not be lower than 2.3 inches of water column.**

- (I) Pursuant to 40 CFR 63.1209(o)(3)(v) and a letter from U.S. EPA on September 13, 2004, Condenser/Absorber Liquid to Gas Ratio – Minimum hourly rolling average condenser/absorber liquid to gas ratio established from **manufacturer's specifications for liquid flow rate** and the average of the performance test run averages **for flue gas flow rate**. [40 CFR 63.1209(o)(3)(v)]

**For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid to gas ratio shall not be lower than 0.0561 (gallons per minute) per (standard cubic feet per minute), wet basis.**

- (J) Polishing Scrubber Liquid to Gas Ratio – Minimum hourly rolling average polishing scrubber liquid to gas ratio established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(v)]

**For TO3 liquid waste incinerator, the hourly rolling average condenser/absorber liquid to gas ratio shall not be lower than 0.0561 (gallons per minute) per (standard cubic feet per minute), wet basis.**

- (K) Hydro-Sonic™ Scrubber Liquid pH - Minimum hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle established from the average of the performance test run averages. [40 CFR 63.1209(o)(3)(iv)]

**For TO3 liquid waste incinerator, the hourly rolling average Hydro-Sonic™ scrubber liquid pH at 1<sup>st</sup> stage free jet nozzle shall not be lower than 5.8.**

- (b) Continuous operation of a CMS is defined as sampling the regulated parameter without interruption, evaluating the detector response at least once every 15 seconds, and computing and recording the average value at least every 60 seconds.
- (c) Pursuant to the HWC MACT standards [40 CFR 63.1209(a)(5)] and the monitoring methods for PSD sources [326 IAC 2-1.1-11], the Permittee may petition the Administrator to use CEMS for monitoring in lieu of compliance with the operating parameter limits established in (a) of this condition.
- (d) If applicable, the Permittee may document compliance using the waiver provisions of 40 CFR 63.1207(m) in lieu of complying with the requirements of (a) and (c) of this condition.

- (e) Pursuant to 40 CFR 63.1207(h), the operating parameter limits specified in Condition D.12.16(a) are waived during subsequent comprehensive performance tests.
- (f) Pursuant to 40 CFR 63.1207(h), the operating parameter limits specified in Condition D.12.16(a) are waived during pre-testing prior to comprehensive performance testing for an aggregate time not to exceed 720 hours (unless an extension is approved by IDEM) under an approved test plan or if the source records the results of the pre-testing.
- (g) If the Permittee submits a new Notification of Compliance based on the results of a subsequent comprehensive performance test, pursuant to 40 CFR 63.1210(b), the operating parameter limits specified in the new Notification of Compliance supersede the operating parameter limits in Condition D.12.16(a) until the operating permit is revised to incorporate the new operating parameter limits.

50. In accordance with the requirements of Condition D.13.4, the Bartlett-Snow solid waste incinerator ceased operation prior to September 1, 2005. The last day of operation of the Bartlett-Snow incinerator was August 30, 2005. Therefore, other than the general record keeping requirements described in Condition C.18, which would require that records of all required monitoring data, reports and support information required until August 30, 2005 by Section D.13 be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report or application, all other operating conditions are no longer applicable. Accordingly, the Permittee requested the following changes in Section D.13, which have been included in this permit modification.

## SECTION D.13 SOLID WASTE INCINERATOR OPERATING CONDITIONS

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

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

- (a) The following emissions units are subject to applicable requirements described in this D section. **The Bartlett-Snow solid waste incinerator was permanently shut down on August 30, 2005, and is designated for demolition.**

...

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

#### D.13.1 Particulate Matter Emission Standards [CP 165-4733] [40 CFR Part 52, Subpart P] [326 IAC 4-2]

##### Reserved

- (a) Pursuant to CP 165-4733, particulate matter from the solid waste incinerator (RK01) shall not exceed 20 pounds per hour and 12 tons per year.
- ~~(b) Prior to September 30, 2004 and until U.S. EPA approval of the revised requirements of 326 IAC 4-2 (26 Ind. Reg. 1071) into the SIP, pursuant to the approved SIP applicable to incinerators [40 CFR Part 52, Subpart P], the Bartlett-Snow Incinerator (BSI) shall:~~
  - ~~(1) Consist of primary and secondary chambers or the equivalent. The design and operation of this incinerator in accordance with the requirements of this section of the permit is equivalent to the design and operation of a primary and secondary chamber.~~
  - ~~(2) Be equipped with a primary burner unless burning wood products,~~
  - ~~(3) Comply with 326 IAC 5-1 and 326 IAC 2,~~

- ~~(4) — Be maintained properly as specified by the manufacturer and approved by the commissioner. The issuance of this permit shall be considered approval by the commissioner.~~
- ~~(5) — Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner. The issuance of this permit shall be considered approval by the commissioner.~~
- ~~(6) — Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.~~
- ~~(7) — Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.~~
- ~~(8) — Not emit particulate matter in excess of three tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air, and~~
- ~~(9) — Not create a nuisance or a fire hazard.~~

~~If any of the above result, the burning shall be terminated immediately.~~

~~This provision shall expire when U.S. EPA approves the current version of 326 IAC 4-2 into the State Implementation Plan.~~

- ~~(c) — Beginning September 30, 2004, pursuant to 326 IAC 4-2, the Bartlett Snow Incinerator shall:~~

~~Consist of primary and secondary chambers or the equivalent. The design and operation of this incinerator in accordance with the requirements of this section of the permit is equivalent to the design and operation of a primary and secondary chamber.~~

~~Be equipped with a primary burner unless burning wood products;~~

~~Comply with 326 IAC 5-1 and 326 IAC 2;~~

- ~~(4) — Be maintained, operated, and burn waste in accordance with manufacturer's specifications; or an operation and maintenance plan that complies with the following:
  - ~~(i) — be designed to meet the PM emission limitation specified in Condition D.13.1(c)(5) and include the following: procedures for receiving, handling and charging waste, procedures for incinerator startup and shutdown, procedures for responding to a malfunction, procedures for maintaining proper combustion air supply levels, procedures for operating the incinerator and associated air pollution control systems, procedures for handling ash, and a list of wastes that can be burned in the incinerator.~~
  - ~~(ii) — each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.~~
  - ~~(iii) — be readily accessible to incinerator operators.~~
  - ~~(iv) — the owner or operator of the incinerator shall notify IDEM, OAQ, in writing, thirty days after the operation and maintenance plan is initially developed pursuant to this section.~~~~

- ~~(5) Not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air; and~~
- (6) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the IDEM, OAQ upon request.

If any of the requirements of (1) through (5) above are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation. This condition is not federally enforceable until U.S. EPA approval of the revised requirements of 326 IAC 4-2 (26 Ind. Reg. 1071) into the SIP.

#### D.13.2 NESHAP for Hazardous Waste Combustors Nonapplicability [40 CFR Part 63, Subpart EEE]

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**Reserved**

~~Pursuant to the requirements of 40 CFR Part 63, Subpart EEE and the compliance date extension letter issued by IDEM on June 19, 2003, the Bartlett-Snow Incinerator shall cease burning hazardous waste prior to September 30, 2004.~~

~~If the above compliance schedule is met, the emissions standards and associated testing, monitoring, record keeping and reporting requirements established in 40 CFR Part 63, Subpart EEE shall not apply to the Bartlett-Snow Incinerator.~~

#### D.13.3 NSPS for Hospital, Infectious and Medical Waste Incinerators [40 CFR Part 60, Subpart Ce] [326 IAC 11-6]

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**Reserved**

~~Beginning September 30, 2004, the Permittee shall not incinerate hospital, infectious and medical waste in quantities that exceed ten percent (10%) by weight of the total waste burned in a calendar quarter. For purposes of this requirement, pathological waste, chemotherapeutic waste, and low-level radioactive waste are not considered hospital, medical or infectious waste.~~

#### D.13.4 NSPS for Commercial and Industrial Solid Waste Incinerators [326 IAC 11-8]

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**Reserved**

~~Pursuant to the requirements of 326 IAC 11-8 and the compliance date extension letter issued by IDEM on June 4, 2003, the Bartlett-Snow Incinerator shall cease operation prior to September 1, 2005, unless further extension is requested by the Permittee and granted by IDEM prior to September 1, 2005. The Permittee shall operate according to the waste management plan as defined under 40 CFR 60.2620 through 60.2630, and submitted to IDEM on September 2, 2003, as required by 326 IAC 11-8-2(e).~~

#### D.13.5 Carbon Monoxide Standards [326 IAC 9] [40 CFR Part 52, Subpart P]

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**Reserved**

- (a) ~~Prior to September 30, 2004 and until U.S. EPA approval of the revised requirements of 326 IAC 9-1 into the SIP, pursuant to 40 CFR Part 52, Subpart P, carbon monoxide emissions from the incinerator shall be controlled by a direct flame afterburner or other approved means. This provision shall expire when U.S. EPA approves the current version of 326 IAC 9-1 into the State Implementation Plan.~~
- (b) ~~Beginning September 30, 2004, pursuant to 326 IAC 9-1, carbon monoxide emissions from the incinerator shall be controlled by a direct flame afterburner or secondary chamber or other approved means. This condition is not federally enforceable until U.S. EPA approval of the revised requirements of 326 IAC 9-1 into the SIP.~~

#### D.13.6 Operating Parameter Limitations

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**Reserved**

~~Pursuant to Construction Permits PC (83) 1490, issued June 15, 1981 and CP 165-4733, issued August 7, 1995:~~

- (a) ~~— The incinerator shall be a multiple chambered unit with a primary burner and an afterburner. When burning non-hazardous waste, the temperature in the first chamber shall be at least 1,350°F and temperature in the second chamber shall be at least 1,550°F. When burning anti-neoplastic agents, the afterburner combustion chamber temperature and residence time shall be maintained at 1,800°F and 1.5 seconds or greater, respectively, at all times the incinerator is operating. When burning RCRA-regulated hazardous waste, the afterburner combustion chamber temperature shall be maintained at 1,750°F or greater at all times.~~
- (b) ~~— The maximum waste feed rate of the incinerator shall be 3,000 pounds per hour. When burning RCRA regulated hazardous waste, or a combination of hazardous and non-hazardous wastes, the waste feed rate shall be no more than 2,300 pounds per hour.~~
- (c) ~~— When burning waste, the hydro-sonic scrubber shall be operated as follows:~~
- (1) ~~— The scrubber water feed rate shall be maintained at no less than 177 and not greater than 240 gallons per minute to Stage 1 and not less than 87 and not greater than 133 gallons per minute to Stage 2.~~
- (2) ~~— The pressure drop across both scrubber stages shall be maintained at no less than 39 inches of water.~~
- (d) ~~— The stack gas flow shall be no greater than 10,900 wet actual cubic feet per minute (ACFM) on a 60 minute rolling average.~~
- (e) ~~— Chloride emissions shall be treated with caustic.~~

~~The Permittee shall cease feeding waste to the incinerator if any of the operating parameter limitations specified in Conditions D.13.6(a) through (d) are exceeded. The Permittee shall take corrective measures to ensure that the operating parameters are back within the limits, as soon as possible. As long as the Permittee ceases feeding waste and takes appropriate corrective measures, an exceedance of an operating parameter limitation shall not be considered a deviation.~~

#### D.13.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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##### **Reserved**

~~A Preventive Maintenance Plan is required for the listed control devices associated with the solid waste incinerator (RK01). The requirements for a Preventive Maintenance Plan are described in Section B, Condition B.10 — Preventive Maintenance Plan.~~

#### Testing and Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.13.8 Testing Requirements [326 IAC 2-7-6(1) and (6)] [326 IAC 2-1.1-11]

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##### **Reserved**

~~The Permittee is not required by this permit to test the solid waste incinerator at this time, but IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. The requirements for conducting performance tests that may be required by IDEM in the future, are described in Section C, Condition C.8 — Performance Testing.~~

#### D.13.9 Scrubber Monitoring

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##### **Reserved**

~~The effectiveness of the scrubber to control particulate matter and acid gas emissions shall be monitored by measuring the following parameters when the incinerator is operating:~~

- (a) ~~— The scrubber water feed rate for Stage 1 and Stage 2 shall be monitored at least once per day.~~
- (b) ~~— The pressure drop across the hydro-sonic scrubber shall be monitored at least once per day.~~

- (c) ~~The pH of the hydro-sonic scrubber water shall be continuously monitored and connected to the waste feed cutoff system.~~

#### D.13.10 Incinerator Combustion Chamber Monitoring

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**Reserved**

The Permittee shall monitor the following operating parameters:

- (a) ~~Combustion chamber temperature (primary burner and afterburner) on a continuous basis.~~
- (b) ~~Number of drums fed to the incinerator per hour, the weight of each drum, and the waste classification (hazardous or non-hazardous) for each drum. Beginning September 30, 2004, the waste classification must also include if the waste is hospital, medical and infectious waste.~~
- (c) ~~Stack gas flow rate on a 60-minute rolling average basis.~~

#### D.13.11 Visible Emission Notations

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**Reserved**

- (a) ~~Visible emission notations of the Bartlett Snow Incinerator stack exhaust shall be performed two times per day during normal daylight operations when exhausting to the atmosphere. A minimum 6-hour period shall separate the two daily readings. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shutdown time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~The Compliance Response Plan for the incinerator shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

#### D.13.12 Hospital, Medical and Infectious Waste Monitoring

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**Reserved**

~~Beginning September 30, 2004, the Permittee shall monitor the weight of hospital, medical and infectious waste; and the total weight of wastes incinerated each calendar quarter.~~

#### D.13.13 Record Keeping Requirements

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- (a) **For the operation of the Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain the following records for of the scrubber in accordance with Condition C.18- General Record Keeping Requirements monitoring as required by Condition D.13.9 as follows:**
- (i1) The scrubber water feed rate for Stage 1 and Stage 2 and pressure drop across the hydro-sonic scrubber shall be recorded at least once per day.
- (i2) The pH of the hydro-sonic scrubber water shall be recorded at least once per hour.
- (b) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005** As required by Condition D.13.10, the Permittee shall maintain records of the continuous monitoring of combustion chamber temperature (primary burner and afterburner), and 60-minute rolling average stack gas flow rate at least once per hour **in accordance with Condition C.18- General Record Keeping Requirements.** The Permittee must also keep records of number of drums fed to the incinerator per hour, the

weight of each drum, and the waste classification (hazardous or non-hazardous) for each drum.

- (c) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the visible emissions monitoring in accordance with Condition C.18- General Record Keeping Requirements, as required by Condition D.13.14.**
- (d) Beginning September 30, 2004 and until **September 30, 2005**, the Permittee shall maintain records of the weight of hospital, medical and infectious waste; and the total weight of wastes incinerated each calendar quarter **in accordance with Condition C.18- General Record Keeping Requirements.**
- (e) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Operation and Maintenance Plan in accordance with Condition C.18- General Record Keeping Requirements.**
- (f) **For the operation of Bartlett-Snow incinerator from October 1, 2004 to August 30, 2005, the Permittee shall maintain records of the Compliance Response Plan in accordance with Condition C.18- General Record Keeping Requirements.**

**Modifications and Construction Requirements [~~326 IAC 2-7-10.5, 326 IAC 2-12 and 326 IAC 2-2~~]**

~~D.13.14 Modifications and Construction: Advance Approval of Permit Conditions~~

~~The emission units described in this D section are not subject to the advance approval permit conditions.~~

- 51. As a result of the Permittee's decision to permanently shut down the BPM production and several of the BPM support operations, the word "BPM" was deleted from the heading for Section D.14 and in Section D.14(a) of the Facility Description. In addition, the emission units included in Section D.10 are a part of the permanent shutdown. Accordingly, references to individual drain systems and Section D.10 were deleted from the Facility Description in Section D.14(a).

**SECTION D.14 BPM SUPPORT OPERATIONS – GENERAL WASTEWATER CONDITIONS**

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

The information describing the processes contained in the following facility description is descriptive information and does not constitute enforceable conditions.

- (a) **BPM Wastewater Operations** – The emission units associated with the **BPM** wastewater operations can generally be described as storage and transfer facilities (wastewater tanks, **and** containers **and** individual drain systems) and treatment facilities (incineration or off-site treatment). The specific emission units are described in Sections D.8, D.9, ~~D.10~~, D.12 and D.15 of this permit.

- 52. BPM Individual Drain Systems described in Section D.10 are a part of the permanent shutdown. Therefore, Condition D.14.3 was revised as follows:

~~D.14.3 Storage and Transfer of Affected Wastewater [40 CFR 63.1256(b), (d), and (e)] [326 IAC 2-2-3]~~

- (a) The following emission units are used to store or transfer affected wastewater ~~from the BPM operations~~:
  - (1) **BPM Waste Containers** – The emission units and performance standards are described in Section D.9 of this permit.
  - (2) **Reserved BPM Individual Drain Systems** – ~~These emission units and performance standards for the individual drain systems are described in Section D.10 of this permit.~~

- (3) Affected Wastewater Tanks – These emission units and performance standards are streamlined with the requirements for ~~BPM~~ waste tanks described in Section D.8 of this permit.
  - (b) The emission units in the Animal Health Manufacturing operations do not store or transfer affected wastewater.
53. The reference to Section D.10 in Condition D.14.5 was deleted, as the testing and monitoring requirements described in Section D.10 are no longer relevant.

#### D.14.5 Testing and Monitoring Requirements

The testing and monitoring requirements for the storage, transfer and treatment of the affected wastewater are described in Sections D.8, D.9, ~~D.10~~, D.12 and D.15 of this permit.

54. As a result of the Permittee's decision to permanently shut down the BPM production and several of the BPM support operations, wastewater subject to the Pharmaceutical MACT is no longer generated at this plant. Accordingly, in Section D.15(a) of the Facility Description, the word "generated" has been revised to "stored". In addition, the word "BPM" has been deleted from the heading for Section D.15.

### **SECTION D.15 ~~BPM~~ SUPPORT OPERATIONS – TRANSFER OF AFFECTED WASTEWATER FOR OFFSITE TREATMENT CONDITIONS**

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

The information in this facility description section does not constitute enforceable conditions. The transfer of affected wastewater for offsite treatment relates to either of the following situations:

- (a) ~~Shipment of affected wastewater generated~~ **stored** onsite to an offsite treatment facility; or
- (b) Receipt of an offsite affected wastewater to be treated onsite.

55. As a result of the Permittee' decision to permanently shut down the BPM production and several of the BPM support operations, there will be no equipment subject to the LDAR requirements in Section E.1. The Permittee requested to revise the facility description in Section E.1 as follows:

## SECTION E.1 LEAK DETECTION AND REPAIR (LDAR) CONDITIONS FOR BPM PROCESS SYSTEM COMPONENTS

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

The following facility description of LDAR components subject to this permit section information is descriptive information and does not constitute enforceable conditions:

- (a) BPM process systems consisted of process operations and non-waste storage serving bulk pharmaceutical manufacturing operations. LDAR applied to BPM process system components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves and lines, valves, connectors, instrumentation systems, control devices, and closed-vent systems intended to operate in volatile organic hazardous air pollutant and/or volatile organic compound (VOHAP/VOC) service for 300 hours or more during the calendar year. In VOHAP/VOC service meant that a piece of equipment either contained or contacted a fluid (liquid or gas) that is ~~was~~ at least 5 percent by weight VOHAP/VOC. **The Permittee permanently shut down the BPM production and several of the BPM support operations which included all of the BPM process system components that were subject to LDAR requirements of this section. Only a few of these BPM process system components had been in actual operation for some time after October 1, 2004. Many of those BPM process system components still physically exist on-site; however, all of those BPM process system components are designated for demolition. The applicable requirements described or referred to in this D section apply to the BPM process system components that were described in this section of the October 1, 2004 version of the Part 70 operating permit.**
- (b) ~~LDAR BPM process system components are located from the point at which raw material serving the BPM operations is unloaded at the plant site to the point of determination (POD) or point where waste exits the pharmaceutical manufacturing process unit (PMPU). The closed-vent system not used to control emissions from LDAR components are not subject to the conditions of this section, but instead are subject to the conditions in Section D.11, as applicable.~~

56. Conditions E.1.1 and E.1.2 were revised as shown since the BPM production and several of the BPM support operations will be shut down.

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

- E.1.1 LDAR Standards for BPM Process System Components [40 CFR 63.1255, 40 CFR Part 63 Subpart I, 326 IAC 8-5-3(b)(6), 326 IAC 2-2]

#### Reserved

~~Except as provided in Condition E.1.2, the following LDAR standards satisfy the requirements of the Pharmaceutical Production MACT (Pharma MACT) standards [40 CFR 63.1255], Hazardous Organic NESHAP [40 CFR Part 63, Subpart I], Best Available Control Technology (BACT) requirements [326 IAC 2-2-3] and Reasonably Available Control Technology (RACT) LDAR requirements for synthesized pharmaceutical manufacturing operations [326 IAC 8-5-3(b)(6)]:~~

- (a) ~~The Permittee shall implement the LDAR program under 40 CFR 63.1255 for all BPM process system component types listed in item (a) of the facility description section from the point at which raw material serving BPM is unloaded at the plant site to the point of determination (POD) or point where waste exits the pharmaceutical manufacturing process unit (PMPU).~~
- (b) ~~The Permittee shall conduct an initial monitoring survey that includes the total number of each existing BPM process component type and initial monitoring as follows:~~
- (1) ~~Existing BPM process system components in VOHAP service shall be initially monitored between January 1, 1998 and October 21, 2003.~~

- ~~(2) Existing BPM process system components in VOC service shall be initially monitored for purposes of this permit between January 1, 1998 and March 31, 2005.~~
- ~~(3) Monitoring periods shall be calendar periods, beginning January 1, 2004.~~
- ~~(c) Each new or changed BPM process system component in VOC/VOHAP service identified during the course of each monitoring period shall be incorporated into the existing component list as necessary within 90 days, or by the next LDAR Periodic Report, following the end of the monitoring period for the type of component monitored, whichever is later.~~
- ~~(d) The following BPM process system components in VOHAP/VOC service shall comply with design standards, shall be operated in accordance with work practice standards or shall undergo periodic LDAR monitoring in accordance with the provisions cited below. Periodic LDAR monitoring shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 21 and 40 CFR 63.1255(b)(4)(v). The regulatory language cited by reference in this section appears in full in Appendix A.~~
  - ~~(1) Pumps in light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(c). This section provides, generally and in part:
    - ~~(A) Single seal pumps shall undergo periodic monitoring and visual inspections;~~
    - ~~(B) Dual mechanical seal pumps with a barrier fluid system shall meet design, operation, inspection, and alarm requirements;~~
    - ~~(C) Pumps designed without a shaft penetrating the pump housing are not required to be inspected or monitored; and~~
    - ~~(D) Pumps equipped with a closed vent system capable of capturing and transporting any leakage from the seals back to the process or to a control device are not required to be inspected or monitored.~~~~
  - ~~(2) Compressors shall be operated in accordance with the standards at 40 CFR 63.1255(b)(3), which requires compliance with 40 CFR 63.164. This section provides, generally and in part:
    - ~~(A) Compressors with barrier fluid seal systems shall meet design, operation, inspection, and alarm requirements.~~
    - ~~(B) Compressors equipped with a closed vent system to capture and transport leakage from the compressor drive shaft seal back to a process or a fuel gas system or to a control device are not required to be inspected or monitored.~~
    - ~~(C) Compressors designated to operate with an instrument reading of less than 500 ppmv above background shall be monitored initially and annually.~~~~
  - ~~(3) Pressure relief devices in gas/vapor service shall be operated in accordance with the standard at 40 CFR 63.1255(b)(3), which requires compliance with 40 CFR 63.165. This section provides, generally and in part:
    - ~~(A) Except during pressure releases, pressure relief devices shall be operated with an instrument reading of less than 500 ppmv above background.~~
    - ~~(B) After each pressure release, the device shall be returned to a monitored condition of less than 500 ppmv above background within 5 calendar days after the release, except if delay of repair applies.~~~~

- ~~(C) — A rupture disk satisfies Conditions E.1.1(d)(3)(A) and (B) without monitoring if it is replaced within 5 calendar days after each pressure release, except if delay of repair applies.~~
- ~~(D) — Any pressure relief device satisfies Conditions E.1.1(d)(3)(A) and (B) without monitoring if it is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage from the pressure relief device to a control device.~~
- ~~(4) — Sampling connection systems shall be operated in accordance with the standard at 40 CFR 63.1255(b)(3), which requires compliance with 40 CFR 63.166. This section provides, generally and in part:~~
- ~~(A) — Gases displaced during filling of a sample container are not required to be captured or collected.~~
- ~~(B) — Each sampling connection system shall be equipped with a closed-purge, closed-loop or closed-vent system which shall:~~
- ~~(i) — Return the purged process fluid directly to the process line; or~~
- ~~(ii) — Collect and recycle the purged process fluid to a process; or~~
- ~~(iii) — Be designed and operated to capture and transport the purged process fluid to a control device; or~~
- ~~(iv) — Collect, store, and transport the purged process fluid to a SOCM/HON waste management unit (40 CFR Part 63, Subpart G) operated according to the provisions which apply to Group 1 wastewater streams, or to a treatment, storage, or disposal facility subject to regulation under 40 CFR Part 262, 264, 265 or 266 (a RCRA unit), or, if the purged fluids are not hazardous waste, to a facility with an appropriate State permit to manage municipal or industrial solid waste.~~
- ~~In-situ sampling systems, and sampling systems without purges, are exempt from the requirements of Conditions E.1.1(d)(4)(B)(i) through (iv).~~
- ~~(5) — Open-ended valves or lines shall be operated in accordance with the standard at 40 CFR 63.1255(d). This section provides, generally and in part:~~
- ~~(A) — Each open-ended valve and line shall be equipped with a cap, blind flange, plug or second valve, which shall seal the open end at all times except when operations require fluid flow through the open-ended valve or line, or during maintenance or repair.~~
- ~~(B) — The cap, blind flange, plug or second valve shall be in place and closed within one hour of cessation of operations requiring fluid flow through the open-ended valve or line, or maintenance or repair. No records are required to document compliance with this provision.~~
- ~~(C) — If a second valve is used, the valve on the process fluid end shall be closed before the other valve is closed.~~
- ~~(D) — If a double block and bleed arrangement is used, the bleed valve may remain open during operations requiring venting the line between the block valves, but shall be closed otherwise in accordance with Condition E.1.1(d)(5)(B).~~

- ~~(E) — Open-ended valves and lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are not required to comply with Conditions E.1.1(d)(5)(A) through (C).~~
- ~~(F) — Open-ended valves or lines containing materials, which would autocatalytically polymerize are not required to comply with Conditions E.1.1(d)(5)(A) through (C).~~
- ~~(G) — Open-ended valves or lines containing materials which could cause a serious safety hazard if capped or equipped with a double block and bleed system are not required to comply with Conditions E.1.1(d)(5)(A) through (C).~~
- ~~(6) — Valves in gas/vapor and light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(e). This section provides, generally and in part:
  - ~~(A) — Valves shall undergo periodic monitoring.~~
  - ~~(B) — Each monitoring period shall be determined by a calculation based on the percentage of leaking valves measured in prior monitoring periods.~~
  - ~~(C) — Valves may be placed into subgroups for periodic monitoring purposes, and may be reassigned among subgroups.~~
  - ~~(D) — After a leaking valve is repaired, it shall be monitored again within 3 months after repair. This monitoring may be considered part of the periodic monitoring, or may, if conducted prior to the periodic monitoring, be considered separately from the periodic monitoring data in determining percent leaking valves for the monitoring period.~~~~
- ~~(7) — Closed-vent systems and control devices used to comply with LDAR shall be operated in accordance with the standard at 40 CFR 63.1255(b)(4)(ii). Operation of these systems, in conformance with Section D.11, shall satisfy this requirement.~~
- ~~(8) — Agitators in gas/vapor and light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(c). This section provides, generally and in part:
  - ~~(A) — Single seal agitators shall undergo periodic monitoring and visual inspections.~~
  - ~~(B) — Dual mechanical seal agitators shall meet design, operation, inspection, and alarm requirements.~~
  - ~~(C) — Agitators designed without a shaft penetrating the agitator housing are not required to be inspected or monitored.~~
  - ~~(D) — Agitators equipped with a closed-vent system capable of capturing and transporting any leakage from the seals back to the process or to a control device are not required to be inspected or monitored.~~~~
- ~~(9) — Pumps, valves, connectors, and agitators in heavy liquid service, instrumentation systems, and pressure relief devices in liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(b)(3), which requires compliance with 40 CFR 63.169. This section provides, generally and in part:
  - ~~(A) — If a component presents visual, audible, or olfactory evidence of a leak, the leak shall be deemed repaired without monitoring if the component meets any of the following:
    - ~~(i) — The visual, audible, or olfactory evidence has been eliminated;~~~~~~

- ~~(ii) — No bubbles are observed at potential leak sites during a leak check using soap solutions; or~~
  - ~~(iii) — The system will hold a test pressure.~~
- ~~(B) — If there is visual, audible, or olfactory evidence of a leak at one of these components, and the leak is not repaired without monitoring, the component shall be monitored within 5 calendar days to confirm whether a leak is in fact present.~~
- ~~(10) — Connectors in gas/vapor and light liquid service shall be operated in accordance with the standard at 40 CFR 63.1255(b)(4)(iii). This section provides, generally and in part:~~
  - ~~(A) — Connectors shall undergo periodic monitoring.~~
  - ~~(B) — Each monitoring period shall be determined by a calculation based on the percentage of leaking connectors measured in prior monitoring periods.~~
  - ~~(C) — Nonrepairable connectors may not be counted in monitoring period calculations.  $C_{AN}$  in the equation in 40 CFR 63.174(i)(2) shall be set to zero in the percent leaking connector calculation.~~
  - ~~(D) — Inaccessible, ceramic, or ceramic-lined connectors are exempt from monitoring, record keeping and reporting. If they are observed to be leaking, they shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except if delay of repair applies. There is no obligation to make a first attempt at repair within 5 days.~~
  - ~~(E) — Connectors that are not required to be monitored are not included in the calculation of the percentage of leaking connectors.~~
  - ~~(F) — An optional credit may be taken for removed connectors where the weld meets certain testing requirements.~~
- ~~(e) — As an alternative to complying with Condition E.1.1(d), except Condition E.1.1(d)(7), BPM process system components may comply with 40 CFR 63.1255(b)(4)(iv), which incorporates by reference 40 CFR 63.178(b) (Alternative Means of Emission Limitation: Batch Processes) as follows:~~
  - ~~(1) — Components shall be pressure tested each time the equipment is reconfigured for production of a different product or intermediate or at least once per year, whichever is more stringent. The pressure testing shall be conducted in accordance with 40 CFR 63.180(f) or (g); and~~
  - ~~(2) — Components must comply with the leak repair requirements before startup of a process as described in 40 CFR 63.178(b)(4).~~
- ~~(f) — As an alternative to complying with Condition E.1.1(d), except Condition E.1.1(d)(7), BPM process system components may comply with 40 CFR 63.179 (Alternative means of Emission Limitation: Enclosed Vented Process Units), which requires that process units be enclosed in such a manner that all emissions from equipment leaks are vented through a closed-vent system to a control device. The enclosure is to be maintained under a negative pressure at all times while the process unit is in operation to ensure that all emissions are routed to the control device. The closed-vent system and control device must comply with Condition E.1.1(d)(7).~~
- ~~(g) — Any visible leak of a liquid containing VOHAP/VOC shall be considered a leak for purposes of the obligation to repair. If it is not clear whether the liquid contains VOHAP/VOC, then~~

Method 21 may be used to confirm whether a leak exists. For each component type, the relevant leak definition and leak repair requirements in Condition E.1.1(d) shall apply for this purpose. All leaks shall be marked as provided in 40 CFR 63.1255(a)(10).

- (h) ~~The Permittee shall initiate repair of any leak no later than 5 calendar days after identification, and complete the repair within 15 days after identification, except where delay of repair is allowed under 40 CFR 63.1255(b)(4)(i), which incorporates by reference 40 CFR 63.171. This shall not affect repair periods under Conditions E.1.1(d)(3) or E.1.1(e). 40 CFR 63.1255(b)(4)(i) provides, generally and in part:~~
- ~~(1) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next scheduled process unit shutdown.~~
  - ~~(2) Delay of repair for equipment for which leaks have been detected is allowed if the owner or operator determines that repair personnel would be exposed to an immediate danger if attempting to repair without a process shutdown. Such repair shall occur by the end of the next scheduled process shutdown.~~
  - ~~(3) Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process and that does not remain in VOC/VOHAP service.~~
  - ~~(4) Delay of repair for valves, connectors, and agitators will be allowed if the emissions from immediate repair attempt would result in greater emissions than delay of repair, and if purged material generated during the repair is collected and destroyed or recovered in a control device.~~
  - ~~(5) Delay of repair for pumps will be allowed if the repair requires the use of a dual mechanical seal system, or a pump designed without an externally actuated shaft penetrating the pump housing, or ducting of the pump fugitive emissions to a closed-vent system and control device, and is completed within 6 months.~~
  - ~~(6) Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, but the supplies, although adequately stocked, have been depleted. Delay of repair beyond the second process unit shutdown is not allowed unless the second shutdown occurs sooner than 6 months after the first shutdown.~~
- (i) ~~Alternative means of emission limitations not already included in 40 CFR 63.1255 may be approved in accordance with 40 CFR 63.1255(b)(3), which incorporates by reference 40 CFR 63.177.~~

#### E.1.2 Exceptions to LDAR Standards for BPM Process System Components

##### **Reserved**

- (a) ~~The following facilities are not subject to the LDAR standards under this section of the permit:~~
- ~~(1) Research and development facilities, activities and equipment [40 CFR 63.1250(d)] not subject to BACT;~~
  - ~~(2) Components on transportation equipment and containers such as railroad cars, tanker trucks and drums (40 CFR 63.1256);~~
  - ~~(3) Utilities and non-process lines [40 CFR 63.1255(a)(5)];~~
  - ~~(4) Bench-scale processes [40 CFR 63.1255(a)(6)];~~
  - ~~(5) Equipment in vacuum service [40 CFR 63.1255(a)(8)];~~

- ~~(6) Waste components (covered by Section E.2 of this permit);~~
- ~~(7) Animal Health Manufacturing operations;~~
- ~~(8) Equipment in VOHAP/VOC service but that is in such service less than 300 hours per calendar year [40 CFR 63.1255(a)(9)];~~
- ~~(9) Closed loop heat exchange systems [40 CFR 63.1255(a)(5)]; and~~
- ~~(10) Welded fittings (40 CFR 63.1251).~~
  
- ~~(b) Equipment that is designated as unsafe to monitor, unsafe to inspect, difficult to monitor, difficult to inspect, or inaccessible shall comply with 40 CFR 63.1255(f). This section provides, generally, that accessible equipment shall be monitored according to a written plan that provides for monitoring as often as practicable, considering safety concerns, but not more often than otherwise applicable. Inaccessible equipment is not required to be routinely monitored at any time, although any observed leaks must be repaired within 15 days.~~

57. Condition E.1.3(a) was revised as shown. Conditions E.1.3(b), E.1.3(c), and E.1.4(a) and (b) are no longer relevant and were deleted.

## Record Keeping and Reporting Requirements

### E.1.3 Record Keeping and Reporting Requirements

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- (a) **From October 1, 2004 to the date on which the Permittee submitted the final LDAR compliance report** ~~Records of information and data related to showing compliance with the LDAR Standards for BPM Process System Components Condition E.1.4,~~ shall be kept in accordance with 40 CFR 63.1255(g), including but not limited to:
  - (1) Identification of components that ~~are~~ **were** subject to the rule with information indicating their method of compliance, with justifications as appropriate, except that inaccessible, ceramic, or ceramic-lined connectors subject to 40 CFR 63.1255(f)(4) need not be identified;
  - ...
  - ~~(8) Records of visual inspections;~~
  - ~~(9) Records of leaks detected, repair information, and delays of repair;~~
  - ~~(10) Records of pressure tests, the test pressure, and the pressure drop observed during the test;~~
  - ~~(11) Records of compressor and relief device compliance tests;~~
  - ~~(12) Records for closed vent systems and control devices subject to Condition E.1.1(d)(7);~~
  - ~~(813)~~ For components in heavy liquid service, records demonstrating that they are in heavy liquid service;
  - ~~(914)~~ Identification of components exempt because they are in VOHAP/VOC service for less than 300 hours per year; and
  - ~~(15) Records of alternative means of compliance determination.~~

**(10) Records of reports submitted in accordance with the requirements of Conditions E.1.3(b) and (c) of Part 70 operating permit, dated October 1, 2004.**

- ~~(b) Reporting requirements for information and data related to Condition E.1.1 shall be conducted in accordance with 40 CFR 63.1255(h), including:~~
- ~~(1) The Initial LDAR Report of compliance information for this permit shall be submitted within 90 days after issuance of the permit and shall include the following information:~~
- ~~(A) For equipment not complying via the alternate standard, the Permittee shall identify in the report each process group and state which rules it is subject to, the approximate number of component in VCHAP/VOC service, and the method of compliance with the standard.~~
- ~~(B) For equipment complying via the alternative standard at 40 CFR 63.1255(b)(4)(iv), the Permittee shall provide products or product codes subject to this standard.~~
- ~~(2) The last independent Pharmaceutical MACT LDAR Periodic Report shall be submitted by October 30, 2004 and shall cover the period from April 1, 2004 through September 30, 2004.~~
- ~~(3) The first streamlined LDAR Periodic Report shall be submitted by April 30, 2005 and shall include the following monitoring periods:~~
- ~~(A) For BACT, this report shall cover the monitoring period from the date of issuance of this permit through March 31, 2005.~~
- ~~(B) For Pharmaceutical MACT, this report shall cover the monitoring period from October 1, 2004 to March 31, 2005.~~
- ~~(4) Subsequent LDAR Periodic Reports shall cover the monitoring periods from April 1 to September 30, and October 1 to March 31, respectively. Reports shall be submitted 30 days following the 6-month monitoring period. The report shall include any revisions to the information reported earlier if the method of compliance has changed since the last report. The report shall also contain the following information:~~
- ~~(A) For equipment not complying via the alternative standard, the Permittee shall report the following information for pumps, valves, agitators, and connectors subject to periodic LDAR monitoring:~~
- ~~(i) Number of leaks detected and percent leakers;~~
- ~~(ii) Number of leaks not repaired within the required timeframe;~~
- ~~(iii) An explanation of any delay of repairs;~~
- ~~(iv) Notice of a change to monthly monitoring for either pumps or valves, if applicable; and~~
- ~~(v) Notification of a change in connector monitoring alternatives, if applicable.~~
- ~~(B) Results of all monitoring required for applicable compressors, pressure relief devices in gas/vapor service, and closed vent systems;~~
- ~~(i) Number of leaks not repaired within the required timeframe; and~~

- (ii) ~~— An explanation of any delay of repairs.~~
- (C) ~~— For equipment complying via the alternative standard at 40 CFR 1255(b)(4)(iv), the Permittee shall report the following information for each product process equipment train:
  - (i) ~~— Number of pressure tests conducted;~~
  - (ii) ~~— Number of instances where the equipment failed either a retest or 2 consecutive pressure tests;~~
  - (iii) ~~— Facts that explain any delay of repairs; and~~
  - (iv) ~~— Results of all monitoring to determine compliance for closed-vent systems used to comply with this section of the permit.~~~~
- (c) ~~— Reports shall be submitted using the reporting forms located at the end of this permit, or their equivalent.~~

**Modifications and Construction Requirements [~~326 IAC 2-7-10.5, 326 IAC 2-7-12, 326 IAC 2-2~~]**

**E.1.4 ~~Modifications and Construction: Advance Approval of Permit Conditions~~**

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- (a) ~~— The Permittee may modify any existing components listed in this section of the permit without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the modified emission units are subject to the same applicable requirements listed in this section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.~~
  - (b) ~~— The Permittee may construct and install new emission units of the types described in this section without obtaining a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2), provided the new emission units are subject to the same applicable requirements listed in this section, and the Permittee shall comply with the Change Management and Flexible Permit provisions in Section F.1 of this permit.~~
58. In Section E.2, Facility Description E.2(a) and (b), heading for Conditions E.2.1 and E.2.2, Conditions E.2.1(a) through (d), and Condition E.2.3(b)(3), references to “BPM waste system” was revised to “waste system”. Also, the facility description in Section E.2(b) was revised as follows:

## SECTION E.2 LEAK DETECTION AND REPAIR (LDAR) CONDITIONS FOR BPM WASTE SYSTEM COMPONENTS

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

The following facility description of LDAR components subject to this permit section is descriptive information and does not constitute enforceable conditions:

- (a) LDAR applies to **BPM** waste system components consisting of pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves and lines, valves, connectors, control devices, and closed-vent systems used to comply with this LDAR program, intended to operate in volatile organic hazardous air pollutant and/or volatile organic compound (VOHAP/VOC) service for 300 hours or more during the calendar year. In VOHAP/VOC service means that a piece or equipment either contains or contacts a fluid (liquid or gas) that is at least 10 percent by weight of total VOHAP/VOC.
- (b) LDAR **BPM**-waste system components are located from the point of **delivery of affected wastewater or offsite waste materials** generation (~~POG~~) or point of determination (~~POD~~), as applicable, to the last component prior to entering the hazardous waste combustor or, **from the waste storage tanks to the last component prior to** being loaded onto tankers for transport offsite. The closed-vent system not used to control emissions from LDAR components is not subject to the conditions of this section, but instead is subject to the conditions in Sections D.11, as applicable.

59. As a result of the Permittee's decision to shut down the BPM production and several of the BPM support operations, the facility no longer manufactures pharmaceutical products by chemical synthesis. Therefore, the requirements of 326 IAC 8-5-3 are no longer applicable to facility operations. Condition E.2.1 was revised as shown:

### E.2.1 LDAR Standards for ~~BPM~~ Waste System Components [40 CFR 63.691, ~~326 IAC 8-5-3(b)(6)~~, 326 IAC 2-2]

Except as provided in Condition E.2.2, the following LDAR standards satisfy the requirements of the Volatile Organic Liquid Storage Vessel Standards [40 CFR 60.110b], Off-Site Waste and Recovery Operations (OSWRO) MACT Standards [40 CFR 63.691], **and** Best Available Control Technology (BACT) requirements [326 IAC 2-2-3] ~~and Reasonably Available Control Technology (RACT) LDAR requirements for synthesized pharmaceutical manufacturing operations [326 IAC 8-5-3(b)(6)]~~:

- (a) The Permittee shall implement the LDAR program under 40 CFR Part 61, Subpart V for all **BPM**-waste system component types listed in item (a) of the facility description section from the point of **delivery of affected wastewater or offsite waste materials** ~~determination (POD) or at the exit of the pharmaceutical manufacturing process unit (PMPU)~~ to the last piece of regulated equipment prior to entering the hazardous waste combustor, or **from the waste storage tanks to the last piece of regulated equipment prior to being** loaded onto tankers for transport offsite.
- (b) Existing **BPM** waste system components in VOC/VOHAP service are covered under 40 CFR Parts 264 and 265, Subpart BB. Data taken for purposes of Subpart BB shall satisfy the data requirements for entry into the alternate standard at 40 CFR 61.243-1. Monitoring periods are calendar periods as defined at 40 CFR Part 61, Subpart V and 40 CFR Parts 264 and 265, Subpart BB.
- (c) Each new or changed **BPM** waste system component in VOC/VOHAP service identified during the course of each monitoring period shall be incorporated into the existing component list as necessary within 90 days, or by the next LDAR Periodic Report, following the end of the monitoring period for the type of component monitored, whichever is later.
- (d) The following **BPM** waste system components in VOHAP/VOC service shall comply with design standards, shall be operated in accordance with work practice standards, or shall undergo periodic LDAR monitoring in accordance with the provisions cited below. Periodic LDAR monitoring shall be performed in accordance with 40 CFR Part 60, Appendix A,

Method 21. The regulatory language cited by reference in this section appears in full in Appendix A.

...

60. Condition E.2.2(c) was revised as follows:

**E.2.2 Exceptions to LDAR Standards for ~~BPM~~ Waste System Components**

---

...

(c) ~~PBPM~~ process systems including non-waste storage and process operations **that are not used for handling affected wastewater or offsite waste materials** (covered by Section E.1 of this permit);

...

**E.2.3 Record Keeping and Reporting Requirements**

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...

(b) Reporting requirements for information and data related to Condition E.2.1 shall be conducted in accordance with 40 CFR 61.247, including:

...

(3) The first streamlined ~~BPM~~ Waste System LDAR Periodic Report shall be submitted by January 30, 2005 and shall cover the following monitoring periods:

61. The facility description under Section F.1 was revised in order to incorporate all the changes that were proposed for Sections D.1 through D.16 and Sections E.1 and E.2, as shown:

**SECTION F.1 CHANGE MANAGEMENT AND FLEXIBLE PERMIT CONDITIONS**

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

The information described in the following paragraphs is descriptive information and does not constitute enforceable conditions:

(a) The operations in the areas of the plant site listed below are subject to the change management and flexible permit conditions described in this section. These conditions apply to all emission units listed in the specific sections of the permit listed below and emission units added to the site pursuant to the provisions of this section:

- (1) ~~D.5 BPM – Production Operations~~
- (2) ~~D.6 BPM – Solvent Recovery Operations~~
- (3) ~~D.7 BPM – Solvent Storage Tank Operations~~
- (41) D.8 BPM – Waste Storage Tank Operations
- (52) D.9 BPM – Waste Containers
- (6) ~~D.10 BPM – Individual Drain Systems~~
- (73) D.11 BPM Control Systems – RTO Operations
- (84) D.12 BPM Incineration – TO3/TO4 Liquid Waste Incinerators
- (9) ~~E.1 LDAR – BPM Process System Components~~
- (405) E.2 LDAR – BPM Waste System Components

(b) The operations in the areas listed below are not subject to the change management and flexible permit conditions in this section:

- (1) D.1 Utilities
- (2) D.2 AHM – Fermentation
- (3) D.3 AHM – Product Recovery
- (4) D.4 AHM – Product Finishing
- (5) **D.5 BPM – Production Operations**
- (6) **D.6 BPM – Solvent Recovery Operations**
- (7) **D.7 BPM – Solvent Storage Tank Operations**
- (8) **D.10 BPM – Individual Drain Systems**
- (59) D.13 BPM Incineration – Bartlett-Snow Solid Waste Incinerator

- ~~(610)~~ D.14 ~~BPM~~—General Wastewater Conditions
- ~~(711)~~ D.15 ~~BPM~~—Waste Transfer Activities
- ~~(812)~~ D.16 Insignificant Activities (described in Section A and outside the ~~BPM~~ production and support operations **in the areas of the plant site that are subject to the change management and flexible permit conditions**)
- (13) E.1 LDAR – BPM Process System Components**

F.1.1 Emission Limits [326 IAC 2-2]

- ~~(a) Carbon monoxide (CO) emissions from the facilities operating under the flexible permit conditions and the Bartlett-Snow solid waste incinerator shall not exceed 300 tons per 12-month period, rolled on a calendar month basis.~~
- ~~(b) Fluorides (F) emissions from the facilities operating under the flexible permit conditions and the Bartlett-Snow solid waste incinerator shall not exceed 10 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:~~

- ~~(1) 5.5 tons of fluorides emissions from the TO3/TO4 liquid incinerators,~~
- ~~(2) 3.5 tons of fluorides emissions from the RTOs, and~~
- ~~(3) 1 ton of fluorides emissions from the Bartlett-Snow solid waste incinerator.~~

**Fluorides emissions from the facilities operating under the flexible permit conditions shall not exceed 9 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:**

- (1) 5.5 tons of fluorides emissions from the TO3/TO4 liquid incinerators; and**
- (2) 3.5 tons of fluorides emissions from the RTOs.**

- ~~(c) Nitrogen oxides (NO<sub>x</sub>) emissions from the facilities operating under the flexible permit conditions and the Bartlett-Snow solid waste incinerator shall not exceed 700 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:~~

- ~~(1) 350 tons of NO<sub>x</sub> emissions from the TO3/TO4 liquid incinerators,~~
- ~~(2) 300 tons of NO<sub>x</sub> emissions from the RTOs, and~~
- ~~(3) 50 tons of NO<sub>x</sub> emissions from the Bartlett-Snow solid waste incinerator.~~

**NO<sub>x</sub> emissions from the facilities operating under the flexible permit conditions shall not exceed 650 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:**

- (1) 350 tons of NO<sub>x</sub> emissions from the TO3/TO4 liquid incinerators, and**
- (2) 300 tons of NO<sub>x</sub> emissions from the RTOs.**

- ~~(d) Sulfur dioxide (SO<sub>2</sub>) emissions from the facilities operating under the flexible permit conditions and the Bartlett-Snow solid waste incinerator shall not exceed 310 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:~~

- ~~(1) 200 tons of SO<sub>2</sub> emissions from the TO3/TO4 liquid incinerators,~~
- ~~(2) 75 tons of SO<sub>2</sub> emissions from the RTOs, and~~

~~(3) 35 tons of SO<sub>2</sub> emissions from the Bartlett-Snow solid waste incinerator.~~

**SO<sub>2</sub> emissions from the facilities operating under the flexible permit conditions shall not exceed 275 tons per 12-month period, rolled on a calendar month basis, where the limit shall be applied as follows:**

**(1) 200 tons of SO<sub>2</sub> emissions from the TO3/TO4 liquid incinerators, and**

**(2) 75 tons of SO<sub>2</sub> emissions from the RTOs.**

~~(e) Volatile organic compounds (VOC) emissions from the facilities operating under the flexible permit conditions and the Bartlett-Snow solid waste incinerator shall not exceed 300 tons per 12-month period, rolled on a calendar month basis.~~ **VOC emissions from the facilities operating under the flexible permit conditions shall not exceed 300 tons per 12-month period, rolled on a calendar month basis.**

62. The following revisions were incorporated for Condition F.1.2. Condition F.1.2 (a)(1)(A) through (H) were deleted. Remaining conditions were renumbered accordingly.

F.1.2 Site Modifications and Advance Approval of Modifications [326 IAC 2-7-5(9)] [326 IAC 2-7-5(16)]

The Permittee may make modifications described in subsection (a) below to the operations in Sections ~~D.5 through D.12~~ **D.8, D.9, D.11, D.12, and E.2** of this permit. If actual emissions do not exceed the limits in Section F.1.1, and the Permittee complies with the other provisions of this section, then the Permittee is not required to obtain a source modification approval (otherwise required by 326 IAC 2-7-10.5), a Title V permit modification (otherwise required by 326 IAC 2-7-12), or a Prevention of Significant Deterioration permit (otherwise required by 326 IAC 2-2).

(a) Permitted Modifications

The Permittee may implement changes, including but not limited to, the following modifications without triggering the administrative review processes described above:

~~(1) BPM Process Operations:~~

~~(A) A change in bulk pharmaceutical products or intermediate products manufactured;~~

~~(B) A change in raw materials stored and utilized;~~

~~(C) A change in the method of operation to a process or existing equipment;~~

~~(D) Piping changes, including but not limited to, process piping, waste piping and fume transport piping;~~

~~(E) A physical change to existing equipment;~~

~~(F) Reconstruction or replacement of existing equipment, including but not limited to, process tanks, crystallizers, distillation operations, filters, centrifuges, and dryers;~~

~~(G) Installation of new equipment, including but not limited to, process tanks, crystallizers, distillation operations, filters, centrifuges, and dryers; and~~

~~(H) Reconstruction or replacement of existing production buildings.~~

~~(2) BPM Support Operations:~~

~~(A) A change in solvent material recovered;~~

~~(B) A change in raw materials stored and utilized;~~

~~(CA) A change in the method of operation to a process or existing equipment;~~

~~(CB) Piping changes, including but not limited to, process piping, waste piping and fume transport piping;~~

~~(EC) A physical change to existing equipment;~~

~~(FD) Reconstruction or replacement of existing equipment, including but not limited to, process tanks, receivers, stills, storage tanks; and container transfer operations;~~

~~(GE) Installation of new equipment, including but not limited to, process tanks, receivers, stills, storage tanks; and container transfer operations;~~

- (HF) Reconstruction or replacement of existing ~~solvent recovery operations, storage tanks, storage tank modules, and distillation operations;~~ and
- (IG) Installation of new ~~solvent recovery operations, storage tanks, storage tank modules, and distillation operations.~~

...

(b) Advance Approval and Applicable Requirements

In addition to the emission limits identified in Condition F.1.1 of this permit, the emission limits and standards, testing and monitoring requirements, record keeping requirements, reporting requirements, and other permit conditions applicable to the type of equipment or operation being modified, replaced, reconstructed or installed are described in Sections ~~D.5, D.8, D.9, D.11, through D.12 and E.2~~ of this permit. Each modification will be subject to the relevant provisions of those permit conditions. If a modification would cause an applicable requirement that is not described in this permit to apply, the Permittee shall obtain a source modification approval if otherwise required by 326 IAC 2-7-10.5 and a Title V permit modification pursuant to 326 IAC 2-7-12.

63. Since Permittee has decided to permanently shut down the BPM production and several of the BPM support operations, Conditions F.1.3, F.1.4, F.1.5 and F.1.6 were revised as shown. Furthermore, conditions pertaining to Bartlett-Snow solid waste incinerator are no longer relevant and were deleted since the Permittee has permanently shutdown the Bartlett-Snow solid waste incinerator.

F.1.3 Carbon Monoxide (CO) Emission Limit Determination

---

The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the RTOs and the TO3/TO4 liquid waste incinerators:

...

- ~~(6) **Emissions during RTO bypass periods:** The Permittee shall include any known CO emissions from BPM production buildings not emitted through the RTO due to diversions at the fume transport system. The Permittee may use engineering calculation methods based on ideal gas law equations, stoichiometry, or mass balance, to estimate these emissions.~~

- ~~(b) The following requirements apply to the Bartlett-Snow solid waste incinerator:~~

- ~~(1) **Amount of waste incinerated:** The Permittee shall determine the amount of waste incinerated by the Bartlett-Snow solid waste incinerator each calendar month.~~

- ~~(2) **Emission calculation:** The Permittee shall calculate CO emissions, in tons, each calendar month by multiplying the **monthly** waste incinerated, in tons, by an emission factor of 5.9 lb/ton and converting the resulting emissions to tons.~~

F.1.4 Fluorides Emission Limit Determination

---

The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the RTOs and the TO3/TO4 liquid waste incinerators:

- (1) **Uncontrolled hydrogen fluoride emissions:** The Permittee shall determine the mass of fluorine atoms emitted to the RTOs and TO3/TO4 liquid waste incinerators [as components of fluorine containing compounds] by ~~BPM and BPM~~ support operations, by using engineering calculation methods based on ideal gas law equations, stoichiometry and mass balance. All fluorine atoms shall be considered emitted as hydrogen fluoride (HF) after combustion in the RTOs or the TO3/TO4 liquid waste incinerators.

...

- (4) ~~— **Emissions during RTO bypass periods:** The Permittee shall include any known fluorides emissions from BPM production buildings not emitted through the RTO due to diversions at the fume transport system. The Permittee may use engineering calculation methods based on ideal gas law equations, stoichiometry, and mass balance, to estimate these emissions.~~
- (b) ~~— The following requirements apply to the Bartlett-Snow solid waste incinerator:~~
- (1) ~~— **Amount of waste incinerated:** The Permittee shall determine the amount of waste incinerated by the Bartlett-Snow solid waste incinerator each calendar month.~~
- (2) ~~— **Emission calculation:** The Permittee shall calculate fluorides emissions, in tons, each calendar month by multiplying the monthly waste incinerated, in tons, by an emission factor of 0.298 lb/ton and converting the resulting emissions to tons.~~

#### F.1.5 Nitrogen Oxides (NO<sub>x</sub>) Emission Limit Determination

---

The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the RTOs and the TO3/TO4 liquid waste incinerators:  
...
- (6) ~~— **Emissions during RTO bypass periods:** The Permittee shall include any known NO<sub>x</sub> emissions from BPM production buildings not emitted through the RTO due to diversions in the fume transport system. The Permittee may use engineering calculation methods based on ideal gas law equations, stoichiometry, or mass balance to estimate these emissions.~~
- (b) ~~— The following requirements apply to the Bartlett-Snow solid waste incinerator:~~
- (1) ~~— **Amount of waste incinerated:** The Permittee shall determine the amount of waste incinerated by the BSI solid waste incinerator each calendar month.~~
- (2) ~~— The Permittee shall calculate NO<sub>x</sub> emissions, in tons, each calendar month by multiplying the ~~monthly~~ waste incinerated, in tons, by an emission factor of 7.12 lb/ton and converting the resulting emissions to tons.~~

#### F.1.6 Sulfur Dioxide (SO<sub>2</sub>) Emission Limit Determination

---

The Permittee shall determine actual annual emissions by employing the following techniques:

- (a) The following requirements apply to the TO3/TO4 liquid waste incinerators, and the RTOs when using CEMS to comply with the SO<sub>2</sub> concentration limitations:  
...
- (1) **SO<sub>2</sub> measurement:** The Permittee shall measure SO<sub>2</sub> concentration in the exhaust of with a SO<sub>2</sub> continuous emission monitoring system (CEMS) or follow the data substitution requirements in Condition F.1.6(a)(4).  
...
- (b) The following requirements apply to the RTOs when complying with the 97.5% SO<sub>2</sub> emission reduction requirements:  
...
- (2) **SO<sub>2</sub> emission calculation from BPM production operations and BPM support operations exhausting to the RTOs:** The Permittee shall determine the mass of sulfur atoms emitted to the RTOs [as components of sulfur containing compounds] by BPM and BPM support operations, by using engineering calculation methods based on ideal gas law equations, stoichiometry and mass balance. All sulfur atoms shall be considered emitted as sulfur dioxide (SO<sub>2</sub>) after combustion in the RTOs. The Permittee shall base SO<sub>2</sub> emissions on an RTO scrubber control efficiency of

97.5%. If the monitoring data is not available or indicates the scrubbers are not achieving this control efficiency, the Permittee shall use a control efficiency of zero percent (0%).

...

- (4) ~~**Emissions during RTO bypass periods:** The Permittee shall include any known SO<sub>2</sub> emissions from BPM production buildings not emitted through the RTO due to diversions in the fume transport system. The Permittee may use engineering calculation methods based on ideal gas law equations, stoichiometry, or mass balance to estimate these emissions.~~  
**[Reserved]**

...

~~(c) The following requirements apply to the Bartlett-Snow solid waste incinerator:~~

- ~~(1) **Amount of waste incinerated:** The Permittee shall determine the amount of waste incinerated by the Bartlett-Snow solid waste incinerator each calendar month.~~
- ~~(2) The Permittee shall calculate SO<sub>2</sub> emissions, in tons, each calendar month by multiplying the monthly waste incinerated, in tons, by an emission factor of 4.34 lb/ton and converting the resulting emissions to tons.~~

64. The reference to "BPM production buildings and storage tank modules" was revised to "waste storage tanks" in Conditions F.1.7(a)(6) and F.1.7(d) (formerly Condition F.1.7(e)). The first paragraph of Condition F.1.7(b)(2) was revised as shown. Also, the third column in the table under this condition is no longer relevant and was deleted. Condition F.1.7(d) is no longer relevant as a result of permanent shutdown of Bartlett-Snow solid waste incinerator.

#### F.1.7 Volatile Organic Compound (VOC) Emission Limit Determination

---

...

(a) The following requirements apply to the RTOs when compliance is based on the 20 ppmv alternative standard:

...

- (6) **Emissions during RTO bypass periods:** The Permittee shall include any known VOC emissions from ~~BPM production buildings and~~ **waste storage tanks modules** not emitted through the RTO due to diversions in the fume transport system. The Permittee may use engineering calculation methods based on ideal gas law equations, stoichiometry, or mass balance to estimate these emissions.

...

(b) The following requirements apply to the RTOs when compliance is based on the 98% control efficiency standard:

...

- (2) **VOC emission calculation from BPM production operations and BPM support operations exhausting to the RTOs:** ~~The Permittee shall estimate the uncontrolled VOC emissions from the BPM production operations and the BPM support operations (solvent recovery operations and solvent storage tanks) exhausting to the RTOs by using engineering calculation methods based on ideal gas law equations, stoichiometry, or mass balance.~~

The Permittee shall use the following emission factors for estimating uncontrolled VOC emissions from the ~~BPM~~-support operations (waste storage tanks):

Activity	VOC Emission Factor	
	C9 Tank Farm	Buildings C3, C13, C13A and C63, and C64 Tank Modules
Primary Waste Charging	1.74 lb/1,000 gal	1.74 lb/1,000 gal
Secondary Waste Charging	1.905 lb/1,000 gal	0.953 lb/1,000 gal
Diurnal Losses from Primary Waste Tanks	14.32 lb/day	0.23 lb/day
Diurnal Losses from Secondary Waste Tanks	45.26 lb/day	0.47 lb/day

...

- (d) ~~The following requirements apply to the Bartlett-Snow solid waste incinerator:~~
- ~~(1) **Amount of waste incinerated:** The Permittee shall determine the amount of waste incinerated by the Bartlett-Snow solid waste incinerator each calendar month.~~
  - ~~(2) The Permittee shall calculate VOC emissions, in tons, each calendar month by multiplying the monthly waste incinerated, in tons, by an emission factor of 5.98 lb/ton and converting the resulting emissions to tons.~~

**Reserved**

- (e) Fugitive VOC emissions from ~~BPM and BPM~~ Support Operations: The Permittee shall determine monthly fugitive VOC emissions using the following calculation methods:

65. As a result of removing the equipment in the BPM operations and BPM support operations, the Permittee stated that they will no longer have any existing process vents or storage tanks subject to the requirements in Condition F.1.9. Condition F.1.9(c) will only apply to any new process vent or storage tanks which might be installed in the future. Therefore, Conditions F.1.9(c)(1) and (2) have been revised as follows:

**F.1.9 Change Management Evaluation Process**

---

...

- (c) Documentation of the evaluation of each new process operating scenario will contain the following information:
- (1) For new ~~or changed~~ process vents, a statement regarding the method for complying with 40 CFR 63.1254. The statement shall include an analysis ~~that shows whether the new or changed process vents fit within an existing~~ **regarding the need for conducting a** compliance demonstration, ~~or whether another demonstration must be conducted.~~
  - (2) For new ~~or changed~~ storage tanks, a statement regarding the method for complying with 40 CFR 63.1253. The statement shall include an analysis ~~that shows whether the new or changed storage tank fits within an existing~~ **regarding the need for conducting a** compliance demonstration, ~~or whether another demonstration must be conducted.~~

...

66. The source requested that the reference to “BPM operations and BPM Support operations” be revised to “operating areas that are subject to pharmaceutical MACT requirements” in Conditions F.1.10(b)(1) to (3) because the BPM operations are removed from the plant. The equipment in the BPM support operations that is subject to NESHAP, Subpart GGG requirements still exists on the site. Therefore, Condition F.1.10 has been revised as follows:

F.1.10 Records and Reporting of Site Modifications [326 IAC 2-7-5(16)] [326 IAC 2-7-20(a)] [40 CFR 63.1259] [40 CFR 63.1260]

---

- ...
- (b) Pharmaceutical MACT operating scenarios:
- (1) Pursuant to 40 CFR 63.1259(c), for all equipment subject to the pharmaceutical MACT requirements, the Permittee shall develop a record describing operating scenarios that may occur in the ~~BPM operations and BPM Support operations~~ **operating areas that are subject to pharmaceutical MACT requirements.**
  - (2) Pursuant to 40 CFR 63.1260(f)(4), for all equipment subject to the pharmaceutical MACT requirements, the Permittee shall list all known operating scenarios that may occur in the ~~BPM operations and BPM Support operations~~ **operating areas that are subject to pharmaceutical MACT requirements** in the notification of compliance status report.
  - (3) Pursuant to 40 CFR 63.1259(b)(8), for all equipment subject to the pharmaceutical MACT requirements, the Permittee shall maintain a log that records which operating scenarios have been put into effect in the ~~BPM operations and BPM Support operations~~ **operating areas that are subject to pharmaceutical MACT requirements.**

67. In Condition F.1.14, reference to "Sections D.5 through D.12" was revised to "Sections D.8, D.9, D.11, and D.12".

F.1.14 Valid Period for Best Available Control Technology [326 IAC 2-2-3(4)]

---

The modifications that occur under this permit qualify as a single, ongoing phase of construction and modification to Clinton Laboratories. The BACT requirements established in Sections ~~D.5~~ **D.8, D.9, D.11 through and** D.12 shall remain valid over the entire period of this permit. If the time between consecutive modifications exceeds 18 months, the Permittee shall demonstrate that the initial BACT determination incorporated into the permit is still valid or propose new BACT requirements. The Permittee may provide, in its application for renewal of the permit, that the initial BACT determination incorporated into the permit is still valid or propose new BACT requirements. Upon expiration of this permit, Major New Source Review (NSR) requirements (Prevention of Significant Deterioration and Nonattainment NSR) shall apply.

68. Under the Streamlined LDAR Periodic Report, PART 1: LDAR Report for Process System Components" is no longer a relevant requirement and was deleted. The reference to "PART 2:" was also removed.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Section E – Leak Detection and Repair (LDAR) Program  
Streamlined LDAR Periodic Report**

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009

Period: \_\_\_\_\_ Year: \_\_\_\_\_

PART 1: \_\_\_\_\_ LDAR Report for Process System Components

Process Unit:  
 Equipment Type:  
 Service:

Monitoring Period	Number Tested	Number Leakers	Percent Leakers	Process Unit Shutdown Periods

Number of Components	Number Added	Number Removed

Process Unit:  
 Equipment Type:  
 Service:

Monitoring Period	Number Tested	Number Leakers	Percent Leakers	Process Unit Shutdown Periods

Number of Components	Number Added	Number Removed

**PART 2: LDAR Report for Waste Components**

Process Unit:  
 Equipment Type:  
 Service:

Monitoring Period	Number Tested	Number Leakers	Percent Leakers	Process Unit Shutdown Periods

...

- 69. The existing Change Management and Flexible Permit Requirements Quarterly Emission Limit Report was deleted because this reporting form was applicable until July 31, 2006.

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

**Section F.1 – Change Management and Flexible Permit Requirements  
 Quarterly Emission Limit Report**

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009  
Facility: BPM Operations (RTOs, TO3/TO4, BSI, and BPM Building Fugitives)  
Parameter: BPM Operations Emission Limits for VOC, CO, NO<sub>x</sub>, SO<sub>2</sub>, and Fluorides  
Limit:

Pollutant	RTOs (tons/yr)	TO3/TO4 Incinerators (tons/yr)	Bartlett-Snow Incinerator (tons/yr)	BPM Fugitives (tons/yr)	TOTAL (tons/yr)
VOC	N/A	N/A	N/A	N/A	300
CO	N/A	N/A	N/A	N/A	300
NO <sub>x</sub>	300	350	50	N/A	700
SO <sub>2</sub>	75	200	35	N/A	310
Fluorides	3.5	5.5	1	N/A	10

The attached spreadsheet provides the monthly actual emissions for the BPM and BPM Support operations. The information is used to determine the emission limits provided above. This emission summary report is:

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

70. A revised reporting form for the Change Management and Flexible Permit Requirements Quarterly Emission Limit was added to the permit which would be applicable on and after August 1, 2006 as shown:

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### Section F.1 – Change Management and Flexible Permit Requirements Quarterly Emission Limit Report

Source Name: Eli Lilly and Company, Clinton Laboratories  
Source Address: 10500 South SR 63, Clinton, Indiana 47842  
Mailing Address: P.O. Box 99, Clinton, Indiana 47842  
Part 70 Permit No.: T165-6462-00009  
Facility: RTOs, TO3/TO4, and Support Operations Fugitives  
Parameter: Emission Limits for VOC, CO, NO<sub>x</sub>, SO<sub>2</sub>, and Fluorides  
Limit:

Pollutant	RTOs (tons/yr)	TO3/TO4 Incinerators (tons/yr)	Support Operations Fugitives (tons/yr)	TOTAL (tons/yr)
VOC	N/A	N/A	N/A	300
CO	N/A	N/A	N/A	300
NO <sub>x</sub>	300	350	N/A	650
SO <sub>2</sub>	75	200	N/A	275
Fluorides	3.5	5.5	N/A	9

The attached spreadsheet provides the monthly actual emissions for operating areas subject to flexible permit requirements. The information is used to determine the emission limits provided above. This emission summary report is:

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

Pollutant	Actual Emission Estimates, tons								
	Month 1	Previous 11 Months	12-Month Total	Month 2	Previous 11 Months	12-Month Total	Month 3	Previous 11 Months	12-Month Total
<b>RTOs</b>									
VOC, Point									
CO									
NO <sub>x</sub>									
SO <sub>2</sub>									
Fluorides									
<b>TO3/TO4 Liquid Waste Incinerators</b>									
VOC, Point									
CO									
NO <sub>x</sub>									
SO <sub>2</sub>									
Fluorides									
<b>Support Operations</b>									
VOC, Fugitive									
<b>Total</b>									
VOC (Point + Fugitive)									
CO									
NO <sub>x</sub>									
SO <sub>2</sub>									
Fluorides									

Upon further review, IDEM, OAQ has revised Sections C and B as shown.

- All references to IDEM, OAQ's mailing address have been revised throughout the permit as shown. IDEM, OAQ telephone number and facsimile numbers were updated throughout the permit

documents to (317) 233-0178 and (317) 233-6865, respectively. Mail Codes were added under the appropriate sections.

Indiana Department of Environmental Management  
Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6045~~  
Air Compliance Section: **MC 61-53 IGCN 1003**  
Permits Branch: **MC 61-53 IGCN 1003**  
Compliance Branch: **MC 61-53 IGCN 1003**  
Compliance Data Section: **MC 61-53 IGCN 1003**  
Asbestos Section: **MC 61-52 IGCN 1003**  
Technical Support and Modeling: **MC 61-50 IGCN 1003**  
Indianapolis, Indiana ~~46206-46204-2251~~

72. The following changes to Section B Conditions were made for clarification:

**B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

---

- (a) This permit, **T165-6462-00009**, 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, modifications, or amendments of this permit do not affect the expiration date **of this permit**.
- (b) **If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.**

**B.2.1 Term of Conditions [326 IAC 2-1.1-9.5]**

---

**Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:**

- (a) **the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**
- (b) **the emission unit to which the condition pertains permanently ceases operation.**

**B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

---

...

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

...

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6 (1) and (6)] [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 facility:
- (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.
- (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.~~
- (e) (b) A copy of the PMPs 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 PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) (c) 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.

73. IDEM, OAQ revised Condition B.13 as follows:

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**

---

- (a) All terms and conditions of ~~previous permits~~ **established prior to T165-6462-00009, issued October 1, 2004 and** issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised **under 326 IAC 2-7-10.5**, or
  - (3) deleted **under 326 IAC 2-7-10.5**.

by this permit.
- (b) **Provided that all terms and conditions are accurately reflected in this permit, Aall** previous registrations and permits are superseded by this **Part 70 operating** permit.

74. IDEM has clarified the Section B - Operational Flexibility condition as follows:

**B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

---

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 have been obtained;
  - (3) The changes do not result in emissions which exceed the ~~emissions allowable~~ **under limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - ...
  - (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading ~~trades~~ **trades** that are subject to 326 IAC ~~2-8-15(b) through (d)~~ **2-7-20(b), (c), or (e)**. and ~~makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC ~~2-8-15(b)(2)~~ **2-7-20(b)(1)**, (c)(1), and ~~(d)~~ **(e)(2)**.

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

...

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

75 IDEM, OAQ has added the following citation because the source is major source under PSD.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

76. IDEM, OAQ has clarified Condition B.25 – Credible Evidence as follows:

**B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]**

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.~~

**For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.**

77. IDEM has determined that in order to avoid duplication of requirements which may be included in D sections, Condition C.5 shall be removed from the permit. Remaining conditions under Section C were renumbered accordingly.

~~**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**~~

~~Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.~~

78. IDEM, OAQ has included the following condition in Section C, which is mandatory for major sources.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

**The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.**

79. Reference to 326 IAC 3-5 was deleted from Condition C.12 - Maintenance of Continuous Opacity Monitoring because the provisions of 326 IAC 3-5 are included in Section D.1

**C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 3-5]**

...

80. U.S. EPA has requested that the following condition be in every Title V permit. There may be additional conditions that need to be in the permit if the source is subject to this requirement.

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

---

~~The Permittee shall comply with all the applicable provisions of 40 CFR Part 82, wherever applicable to activities at the source.~~

**Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:**

- (a) **Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.**
- (b) **Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.**
- (c) **Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.**

81. Conditions C.18 and C.19 were revised to incorporate recent revisions to the New Source Review rules. The citations for 326 IAC 2-2 and 326 IAC 2-3 were added to Conditions C.18 and C.19. The following changes were made:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] **[326 IAC 2-2] [326 IAC 2-3]**

---

...

- (c) **If there is a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:**
  - (1) **Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:**
    - (A) **A description of the project.**
    - (B) **Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
    - (C) **A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
      - (i) **Baseline actual emissions;**
      - (ii) **Projected actual emissions;**
      - (iii) **Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and**
      - (iv) **An explanation for why the amount was excluded, and any netting calculations, if applicable.**
  - (2) **Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**

- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

---

- ...
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
    - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in , for that regulated NSR pollutant, and
    - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
  - (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
    - (1) The name, address, and telephone number of the major stationary source.
    - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
    - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
    - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by. The general public may request this information from the under 326 IAC 17.1.
82. Due top a recent change, Section A.1 of the permit will not longer reflect the Responsible Official at the facility. However, IDEM, OAQ will continue to gather and retain this information and verify that he/she meets the requirements of a Responsible Official.

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

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The Permittee owns and operates a stationary pharmaceutical manufacturing plant.

Responsible Official: ~~\_\_\_\_\_~~ Mr. Edward B. Canary, General Manager

...

<b>Conclusion and Recommendation</b>
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This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No.:165-22481-00009. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.