

**PART 70 OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL**

**Pfizer Inc
100 Pfizer Drive
Terre Haute, Indiana 47802**

(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.: T167-7586-00013	
Issued by: Original signed by, Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2004 Expiration Date: June 28, 2009

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC). 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)]

The Permittee owns and operates a stationary batch pharmaceutical manufacturing operation facility.

Responsible Official:	Plant Manager
Source Address:	100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address:	PO Box 88, Terre Haute, Indiana 47808
General Source Phone Number:	(812)299-2121
SIC Code:	2833
County Location:	Vigo
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source for Nonattainment NSR

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) One (1) subbituminous coal fired boiler, identified as boiler #8, with No. 1 distillate fuel, No. 6 residual oil, natural gas, and liquefied petroleum gas as backup fuel. Maximum capacity of 150 million (MM) Btu per hour heat input when using coal, No. 1 fuel oil, No. 6 fuel oil; with supplemental natural gas and liquefied petroleum gas burners of 40 million (MM) Btu per hour heat input capacity. Boiler #8 uses a baghouse for control, is equipped with a continuous opacity monitor, and emissions exhaust to stack 1. Boiler #8 was installed in 1981.
- (b) One (1) pharmaceutical manufacturing operation, identified as BLDG 1247, for sterile products. This facility includes process tanks and vessels, sterilization filters, a crystallizer, a centrifuge, product dryers, mills and packaging equipment. Emissions exhausting to stacks 3 and 4. BLDG 1247 was constructed in 1981.
- (c) A steam boiler manufactured by Cleaver-Brooks, identified as B-1, with a maximum heat input capacity of 14.625 million (MM) Btu per hour heat input, fired on either natural gas or #2 fuel oil, utilizing low NOx burners for control and exhausting through stack B-1. Boiler B-1 was installed in 2000.
- (d) A steam boiler manufactured by Cleaver-Brooks, identified as B-2, with a maximum heat input capacity of 14.625 million (MM) Btu per hour, fired on either natural gas or #2 fuel oil, utilizing low NOx burners for control and exhausting through stack B-2. Boiler B-2 was installed in 2000.
- (e) A fuel oil storage tank, identified as Bldg 551, with a maximum capacity of 14,000 gallons, utilizing no control and venting to the atmosphere. Bldg 551 was constructed in 2000.
- (f) A steam boiler, identified as Boiler #9, with a maximum heat input rating of 98.0 million BTU per hour, utilizing natural gas and #2 fuel oil for fuel (propane as a pilot only when natural gas is not available), using low NOx burners and flue gas recirculation for control, and exhausting to stack 1. Boiler #9 was constructed in 2003.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-1-2].
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (c) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight [326 IAC 6-1-2].
- (d) 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.
- (e) Combustion source flame safety purging on startup.
- (f) 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.
- (g) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (h) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (j) Refractory storage not requiring air pollution control equipment.
- (k) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (l) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (m) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3].
- (n) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (o) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-1].
- (p) Closed loop heating and cooling systems.
- (q) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (r) 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.
- (s) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (t) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (u) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (v) Heat exchanger cleaning and repair.
- (w) Process vessel degassing and cleaning to prepare for internal repairs.
- (x) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-1-2].
- (y) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (z) Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day [326 IAC 64].

- (aa) Uncovered coal conveying of less than or equal to 120 tons per day [326 IAC 6-4].
- (bb) Underground conveyors.
- (cc) Coal bunker and coal scale exhausts and associated dust collector vents.
- (dd) Asbestos abatement projects regulated by 326 IAC 14-10.
- (ee) 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.
- (ff) 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.
- (gg) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (hh) On-site fire and emergency response training approved by the department.
- (ii) Emergency generators as follows:
 - (A) Gasoline generators not exceeding 110 horsepower.
 - (B) Diesel generators not exceeding 1600 horsepower.
 - (C) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (jj) Other emergency equipment as follows:
 - (A) Stationary fire pumps.
- (kk) Purge double block and bleed valves.
- (ll) Filter or coalescer media changeout.
- (mm) Vents from ash transport systems not operated at positive pressure.
- (nn) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (oo) Farm Operations
- (pp) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
- (qq) Hydrochloric acid storage and handling operations associated with pharmaceutical manufacturing, referred to herein as Miscellaneous HCl emissions, including:
 - (1) HCl used to regenerate the ion exchange towers in Bioprocessing operations;
 - (2) Use of HCl as reagent in very small quantities in laboratory operations;
 - (3) Use of HCl for heavy duty cleaning in very small quantities in cleaning and maintenance operations; and
 - (4) Presence of HCl in small concentrations, as result of Bioprocessing operations, in wastewater processed in the wastewater treatment plant.
- (rr) Other activities or categories not previously identified:
 - (1) Pharmaceutical production processes in Building 1133, 1163, 1164, 1166, 1167, 1168, 1169, 1172, 1175, 1187, 1193, 1238, 1243, 1244, 1247 and 1250, including all storage tanks associated with the listed buildings.
- (ss) Animal Health Research and Development Area, including livestock shelters, feed processing and space heating operations.

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

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

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

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]

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

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

- (a) 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, VCAPC, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Vigo County Air Pollution Control.

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

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)]

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)]

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)]

- (a) The Permittee shall furnish to IDEM, OAQ, and VCAPC within a reasonable time, any information that IDEM, OAQ, and VCAPC 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, and VCAPC 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 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) As provided in 326 IAC 2-7-5(6), the Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Condition B.12, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 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 submitted on July 1 of the year following issuance of the permit shall cover the time period from the date of final permit issuance through December 31 of the same 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 and VCAPC, 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 and

VCAPC, 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.11 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.

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

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 and VCAPC, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC, 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.12 Emergency Provisions [326 IAC 2-7-16]

- (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 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 and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM-OAQ

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

VCAPC

Telephone Number: (812) 462-3433

Facsimile Number: (812) 462-3447

- (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, P. O. Box 6015

Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control

103 South 3rd Street

Terre Haute, Indiana 47807

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 and VCAPC, 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 and VCAPC, 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. Any emergencies that have been previously reported pursuant to Paragraph (b)(5) of this condition and certified by the Responsible Official need only be referenced by the date of the original report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield as provided in this Condition. 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) 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, or VCAPC 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.
- (c) 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.
- (d) 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.
- (e) 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).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or VCAPC has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or VCAPC has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits 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) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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.16 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]

- (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 or VCAPC, 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 or VCAPC, 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 or VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and VCAPC, 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (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 and VCAPC, on or before the date it is due.

(2) If IDEM, OAQ and VCAPC, 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 and VCAPC, take 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 and VCAPC, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (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)(D)(i) 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.20 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:
 - (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 has 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and VCAPC, 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, VCAPC, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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, VCAPC, 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and VCAPC, 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 or VCAPC, 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, I/M & Billing Section), to determine the appropriate permit fee.

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

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.

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 [40 CFR 52 Subpart P][326 IAC 6-3-2]**
- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.
- 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 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 or VCAPC under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **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. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **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.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
- Except as otherwise provided by statute or 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.
- C.7 **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.8 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-1 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

All required notifications shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

C.9 Performance Testing [326 IAC 3-6]

- (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 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and VCAPC.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 and VCAPC 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, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC, if the Permittee submits to IDEM, OAQ and VCAPC, 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.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

- (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. Section C.12 (Maintenance of Continuous Opacity Monitoring Equipment) establishes the general operation and maintenance requirements for continuous emission monitoring systems and continuous opacity monitoring systems.
- (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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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.

C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 2-1.1-11] [326 IAC 3-5]]

- (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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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 opacity monitoring systems (COMS) and related equipment in accordance with applicable federal regulations and 326 IAC 3-5.
- (c) This provision applies only to COMS operated solely for monitoring compliance with limitations. The continuous opacity monitoring systems shall be operated at all times the emissions unit or process is operating as specified in Section D, except reasonable periods of necessary continuous opacity monitoring system calibration or maintenance activities. Continuous opacity monitoring system 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) With the exception to (c) of this condition, nothing in this condition shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system at all times pursuant to 40 CFR 63.1209, and 40 CFR 63.8.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (b) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ and VCAPC approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

within ninety (90) days after the date of issuance of this permit.

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and VCAPC 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 in accordance with this Condition, 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 time frame 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 Compliance Response Plan, and the Permittee documents such response in accordance with subsections (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken that the Permittee finds to be effective or useful.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response 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 the 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 and VCAPC of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the 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 compliance 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 compliance 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-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.

-
- (a) When the results of a stack test performed in conformance with Section C - 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 and VCAPC, 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 and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and VCAPC may extend the retesting deadline.
 - (c) IDEM, OAQ and VCAPC reserve 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)] [326 IAC 2-7-19]

C.19 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) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6-6. The emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (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 purposes of Part 70 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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 and VCAPC, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

-
- (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 or Vigo County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control 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.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (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 and VCAPC, 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.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

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.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Portable, closed top, cold cleaner degreasers, located at various area shops, each with a maximum capacity less than 145 gallons per 12 months. These degreasers contain petroleum naphtha (mineral spirits), using no controls and exhausting to the atmosphere.

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

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

D.1.1 Cold cleaner operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation) for cold cleaner operations constructed after January 1, 1990, the owner or operator 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 operation 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.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) A steam boiler manufactured by Cleaver-Brooks, identified as B-1, with a maximum heat input capacity of 14.625 million (MM) Btu per hour, fired on either natural gas or #2 fuel oil, utilizing low NOx burners for control and exhausting through stack B-1.
- (b) A steam boiler manufactured by Cleaver-Brooks, identified as B-2, with a maximum heat input capacity of 14.625 million (MM) Btu per hour, fired on either natural gas or #2 fuel oil, utilizing low NOx burners for control and exhausting through stack B-2.
- (c) A fuel oil storage tank, identified as Bldg 551, with a maximum capacity of 14,000 gallons, utilizing no control and venting to the atmosphere.

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

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

D.2.1 General Provisions Relating to NSPS [326 IAC 12][40 CFR 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated under 326 IAC 12, apply to the boilers (B-1 and B-2) except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.2.2 Particulate Matter Limitation (PM) [326 IAC 6-1-2(b)]

Pursuant to 326 IAC 6-1-2(b), no person shall operate a fossil fuel combustion steam generator (any furnace or boiler used in the process of burning solid, liquid, or gaseous fuel or any combination thereof for the purpose of producing steam by heat transfer) so as to discharge or cause to be discharged any gases unless such gases are limited to:

- (d) A particulate matter content of no greater than 0.15 pounds per million Btu for all liquid fuel fired generators.
- (e) A particulate matter content of no greater than 0.01 grains per dry standard cubic foot for all gaseous fuel-fired steam generators.

D.2.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1] [40 CFR 60.42c(d)]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from boilers B-1 and B-2, when combusting #2 fuel oil, shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.2.4 Fuel Oil Use Limitation [326 IAC 2-2][40 CFR 52.21][326 IAC 2-7-10.5(d)(5)(D)]

Pursuant to Minor Source Modification 167-12343-00013 issued on August 8, 2000, the following fuel oil limitation shall be met:

- (a) The fuel oil usage for boiler B-1 shall be limited to less than 233,800 gallons of #2 fuel oil per 12-consecutive month period, with compliance determined at the end of each month.
- (b) The fuel oil usage for boiler B-2 shall be limited to less than 233,800 gallons of #2 fuel oil per 12-consecutive month period, with compliance determined at the end of each month.
- (c) The fuel oil usage limitations of paragraphs (a) and (b) of this Condition D.2.4 combined keep the potential emissions below 25 tons per year of NO_x and SO₂ (in combination with

Condition D.2.3 above). Condition D.2.3 and D.2.4 combined will make 326 IAC 2-2 and 326 IAC 2-7-10.5(f) not applicable.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 12-1] [40 CFR 60.48c(f)][326 IAC 7-2]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification (as described in 40 CFR 60.48c(f)); or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (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.

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

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of boiler B-1 and B-2 stack exhausts shall be performed once per shift during normal daylight operations when the boiler is combusting fuel oil and exhausting to the atmosphere. 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 shut down 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, and D.2.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ and NO_x related fuel usage limits and/or the SO₂ and NO_x emission limits established in Conditions D2.3 and D2.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period (the natural gas fired boiler certification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications, which shall include:
 - (i) The name of the fuel supplier; and
 - (ii) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of stack B-1 and stack B-2, once per daylight shift.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 NSPS Record Keeping Requirements [326 IAC 12-1] [40 CFR 60.48c] [40 CFR 60.116b]

- (a) Pursuant to 40 CFR 60.48c(g) the Permittee shall record and maintain daily records of the amounts of each fuel combusted in each boiler.
- (b) Pursuant to 40 CFR 60.48c(i) all records required under this regulation shall be maintained by the Permittee for a period of two years following the date of such record.
- (c) Pursuant to 40 CFR 60.116b(b) the Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m³ is subject to no provision of this subpart other than those required by this paragraph.

D.2.10 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The natural gas fired boiler certification shall be submitted semi-annually to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.11 NSPS Reporting Requirements [326 IAC 12-1] [40 CFR 60.48c]

- (a) Pursuant to 40 CFR 60.48c(a), as modified by 326 IAC 12-1-2, the Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual

startup, as provided by 40 CFR 60.7. This notification shall include:

- (1) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 40 CFR 60.43c.
 - (2) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - (3) Notification if an emerging technology will be used for controlling SO₂ emissions. The Commissioner will examine the description of the control device and determine whether the technology qualifies as an emerging technology. In making this determination, the Commissioner may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of 40 CFR 60.42c(a) or (b)(1), unless and until this determination is made by the Commissioner.
- (b) Pursuant to 40 CFR 60.48c(b) the Permittee shall submit to the Commissioner the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS using the applicable performance specifications in Appendix B.
- (c) Pursuant to 40 CFR 60.48c(d) the Permittee shall submit quarterly reports to the Commissioner. The initial quarterly report shall be postmarked by the 30th day of the third month following the completion of the initial performance test. Each subsequent quarterly report shall be postmarked by the 30th day following the end of the reporting period.
- (d) Pursuant to 40 CFR 60.48c(e) the Permittee shall keep records and submit quarterly reports as required above, including the following information:
- (a) Calendar dates covered in the reporting period.
 - (b) Each 30-day average SO₂ emission rate (ng/J or lb/million BTU), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
 - (c) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1) of 40 CFR 60.48c, as applicable. In addition to records of fuel supplier certifications, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.

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

- (a) Steam Boiler, identified as Boiler #9, with a maximum heat input rating of 98.0 million BTU per hour, utilizing natural gas and #2 fuel oil for fuel (propane as a pilot only when natural gas is not available), using low NOx burners and flue gas recirculation for control, and exhausting to stack 1.

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

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

D.3.1 General Provisions Relating to NSPS [326 IAC 12][40 CFR 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated under 326 IAC 12, apply to Boiler #9 except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-1-2(b)]

Pursuant to 326 IAC 6-1-2(b), no person shall operate a fossil fuel combustion steam generator (any furnace or boiler used in the process of burning solid, liquid, or gaseous fuel or any combination thereof for the purpose of producing steam by heat transfer) so as to discharge or cause to be discharged any gases unless such gases are limited to:

- (a) A particulate matter content of no greater than 0.15 pounds per million Btu for all liquid fuel fired steam generators
- (b) A particulate matter content of no greater than 0.01 grains per dry standard cubic foot for all gaseous fuel-fired steam generators

D.3.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1] [40 CFR 60.42c(d)][326 IAC 2-2]

- (a) The fuel oil sulfur content for Boiler #9 shall not exceed 0.05% by weight. This requirement also meets the fuel oil sulfur content requirements specified in 40 CFR 60 Subpart Dc, including the sulfur content limit under 40 CFR 60.42c(d).
- (b) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.3.4 Opacity Limitation [326 IAC 12-1] [40 CFR 60.43c(c)]

- (a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall not cause to be discharged into the atmosphere from this facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.
- (b) Pursuant to 40 CFR 60 Subpart Dc, the opacity standard applies at all times when burning #2 fuel oil, except during periods of startup, shutdown, or malfunction.

D.3.5 Fuel Oil Use Limitation [326 IAC 2-2][326 IAC 2-7-10.5(f)]

Pursuant to Significant Source Modification 167-14566 issued on October 15, 2001, the fuel oil usage from Boiler #9 shall be limited to less than 2,526,000 gallons of #2 fuel oil per 12-consecutive month period, with compliance determined at the end of each month. This limitation makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable (in combination with Condition D.3.3 above).

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.7 Sulfur Dioxide - Initial Performance Test [326 IAC 12-1] [40 CFR 60.44c(b) and (h)]

-
- (a) Pursuant to 40 CFR 60, Subpart Dc, the first day of the initial performance test shall be scheduled within 30 days after the facility achieves the maximum production rate, but not more than 180 days after initial startup.
 - (b) Pursuant to 40 CFR 60, Subpart Dc, where the Permittee seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1).

D.3.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 12-1] [40 CFR 60.48c(f)][326 IAC 7-2]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification (as described in 40 CFR 60.48c(f)); or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (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.

D.3.9 Opacity - Initial Performance Test [326 IAC 12-1] [40 CFR 60.45c(a)]

Pursuant to 40 CFR 60, Subpart Dc (as modified by 326 IAC 12-1-2), the Permittee shall conduct an initial performance test for Boiler #9 for opacity as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the Commissioner, to determine compliance with the standards using Method 9 (6-minute average of 24 observations) for determining the opacity of stack emissions. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.3.10 Visible Emissions Notations

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- (a) Visible emission notations of Boiler #9 stack exhaust shall be performed once per shift during normal daylight operations when combusting fuel oil and exhausting to the atmosphere. 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 shut down 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

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

D.3.11 Record Keeping Requirements

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- (a) To document compliance with Condition D.3.3 and D.3.5, the Permittee shall maintain

records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ and NO_x related fuel usage limits and/or the SO₂ and NO_x emission limits established in Conditions D.3.3 and D.3.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications, which shall include:
 - (i) The name of the fuel supplier; and
 - (ii) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.3.10, the Permittee shall maintain records of visible emission notations of Boiler #9 stack exhaust once per daylight shift when combusting fuel oil.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.12 NSPS Record Keeping Requirements [326 IAC 12-1] [40 CFR 60.48c]

- (a) Pursuant to 40 CFR 60.48c(g) the Permittee shall record and maintain daily records of the amounts of each fuel combusted in each boiler.
- (b) Pursuant to 40 CFR 60.48c(i) all records required under this regulation shall be maintained by the Permittee for a period of two years following the date of such record.

D.3.13 Reporting Requirements

- (a) The natural gas fired boiler certification shall be submitted semi-annual to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the reporting period. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A quarterly summary of the information to document compliance with Condition D.3.5 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.14 NSPS Reporting Requirements [326 IAC 12-1] [40 CFR 60.48c]

- (a) Pursuant to 40 CFR 60.48c(a) the Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:
- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 40 CFR 60.43c.
 - (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - (4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Commissioner will examine the description of the control device and determine whether the technology qualifies as an emerging technology. In making this determination, the Commissioner may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of 40 CFR 60.42c(a) or (b)(1), unless and until this determination is made by the Commissioner.
- (b) Pursuant to 40 CFR 60.48c(b) the Permittee shall submit to the Commissioner the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS using the applicable performance specifications in Appendix B.
- (c) Pursuant to 40 CFR 60.48c(d) the Permittee shall submit quarterly reports to the Commissioner. The initial quarterly report shall be postmarked by the 30th day of the third month following the completion of the initial performance test. Each subsequent quarterly report shall be postmarked by the 30th day following the end of the reporting period.
- (d) Pursuant to 40 CFR 60.48c(e) the Permittee shall keep records and submit quarterly reports as required above, including the following information:
- (1) Calendar dates covered in the reporting period.
 - (2) Each 30-day average SO₂ emission rate (ng/J or lb/million BTU), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
 - (3) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1) of 40 CFR 60.48c, as applicable. In addition to records of fuel supplier certifications, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (a) One (1) subbituminous coal fired boiler, identified as boiler #8, with No. 1 distillate fuel, No. 6 residual oil, natural gas, and liquefied petroleum gas as backup fuel. Maximum capacity of 150 million (MM) Btu per hour heat input when using coal, No. 1, and No. 6, and 40 million (MM) Btu per hour heat input capacity when using natural gas, and liquefied petroleum gas. Emissions exhausting to stack 1.
- (b) One (1) pharmaceutical manufacturing operation, identified as BLDG 1247, for sterile products. This facility includes process tanks and vessels, sterilization filters, crystallizers, centrifuge, product dryers, mills and packaging equipment. Emissions exhausting to stacks 3 and 4.

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

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

D.4.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.4.2 Particulate matter emission limitations [326 IAC 6-1-2(b)]

- (1) Pursuant to 326 IAC 6-1-2(b), no person shall operate a fossil fuel combustion steam generator (any furnace or boiler used in the process of burning solid, liquid, or gaseous fuel or any combination thereof for the purpose of producing steam by heat transfer) so as to discharge or cause to be discharged any gases unless such gases are limited to:
 - (1) A particulate matter content of no greater than 0.15 pounds per million Btu for all liquid fuel fired generators.
 - (2) A particulate matter content of no greater than 0.01 grains per dry standard cubic foot for all gaseous fuel-fired steam generators.
- (b) Pursuant to Construction Permit No. 13-2833-C1-80, particulate matter emissions from Boiler #8, when combusting coal, shall not exceed 0.23 pounds per million (MM) Btu.

D.4.3 Sulfur dioxide [326 IAC 7-4-3]

Pursuant to 326 IAC 7-4-3 (SO₂ Emissions Limitations), the SO₂ emissions from Boiler #8 shall be limited to 3.01 pounds per MMBtu heat input. The Animal Health Boiler, listed under this rule, has been removed.

D.4.4 Fuel Use Limitation [326 IAC 2-7-10.5(d)(5)(D)][40 CFR Part 63, Subpart GGG]

- (a) Pursuant to Part 70 Significant Source Modification 167-15658-00013, the Chlorine content of the coal delivered to boiler #8 shall not exceed 9.43 tons per 12-consecutive month period, with compliance determined at the end of each month.
- (b) This limitation, in combination with the Miscellaneous HCl Emissions, restricts the potential emissions of HCl below 10 tons per year. Therefore, Pfizer Inc is not considered a major source for Hazardous Air Pollutants (HAPs) and is not subject to 40 CFR Part 63, Subpart GGG National Emission Standards for Pharmaceuticals Production, or any other NESHAP.

Compliance Determination Requirements

D.4.5 Sulfur Dioxide (SO₂) Emissions and Sulfur Content [326 IAC 7-2]

Pursuant to 326 IAC 7-2-1(c)(2), the Permittee shall demonstrate that the sulfur dioxide emissions from Boiler #8 shall not exceed the limitation established by Condition D.4.3. Compliance shall be determined utilizing one of the following options:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:
 - (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 three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a); or
 - (3) Sample and analyze the coal pursuant to 326 IAC 3-7-3;

Preparation of the coal sample heat content analysis, and sulfur content analysis under any of these three methods shall be determined pursuant to 326 IAC 3-7-2(c), (d), and (e).

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 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(b)]
- (c) Pursuant to 326 IAC 7-2-1(c)(2), the fuel combustion sources with total coal-fired heat input capacity greater than one hundred (100) and less than one thousand five hundred (1,500) million Btus per hour shall submit quarterly reports of the calendar month average coal sulfur content, coal heat content, sulfur dioxide emission rate in pounds per million Btus and the total monthly coal consumption.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.4.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.4.2, the Permittee shall perform PM testing for Boiler #8 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.4.7 Control Equipment

The Baghouse controlling PM emissions from Boiler #8, shall be in operation at all times that Boiler #8 is operating on coal. This Baghouse shall be inspected every major maintenance outage, but no less than every twelve (12) months or an outage of any nature lasting more than three (3) days, unless such inspections have been performed within the last six (6) months.

D.4.8 Hydrogen Chloride (HCl) Emissions and Chlorine Content

Pursuant to 326 IAC 2-7-6, the Permittee shall demonstrate that the chlorine content of coal

delivered to Boiler #8 does not exceed the limitation set in Condition D.4.4 (9.43 tons per 12-consecutive month period). Compliance shall be determined utilizing one of the following options:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:
 - (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 three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a); or
 - (3) Sample and analyze the coal pursuant to 326 IAC 3-7-3;
 - (4) The Chlorine content of coal samples shall be determined in accordance with either the procedures specified in ASTM D2361, Standard Test Methods for Chlorine in Coal, or the procedures specified in ASTM D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method.

Preparation of the coal sample heat content analysis under any of these three methods shall be determined pursuant to 326 IAC 3-7-2(c), (d), and (e).

A determination of noncompliance pursuant to any of the methods specified in (a) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.4.9 Continuous Opacity Monitoring [326 IAC 3-5]

Pursuant to 326 IAC 3-5-1(c)(2)(A), the Permittee shall continuously monitor the breaching from the Boiler #8 baghouse for opacity whenever Boiler #8 is operating on coal except for periods of (i) performance audits required under this Section, and (ii) daily zero and span.

D.4.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Boiler #8, at least once per shift when Boiler #8 is in operation and combusting coal or No.6 fuel oil. 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 Section C- Compliance Response 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 - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and VCAPC, and shall be calibrated at least once every six (6) months.

D.4.11 Baghouse Inspections

An inspection shall be performed for all bags controlling Boiler #8 every major maintenance outage, but no less than every twelve (12) months or an outage of any nature lasting more than three (3) days, unless such inspections have been performed within the last six (6) months. All

defective bags shall be replaced.

D.4.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 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 and VCAPC 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.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

D.4.13 Continuous Opacity Monitor - Performance [326 IAC 3-5-2]

- (a) Performance specifications set forth in 40 CFR 60 Appendix B, shall be used to certify monitoring equipment installed pursuant to this rule; however, where reference is made to the administrator in 40 CFR 60, Appendix B, the term "department" shall be inserted for purposes of this rule.
- (b) The cycling time for the opacity monitor shall not exceed ten (10) seconds. The cycling time is the total time a monitoring system requires to sample, analyze, and record an emission measurement.
- (c) Instrument full-scale response or upper limit of concentration measurement range for all opacity monitoring systems shall be set at one hundred percent (100%) opacity if possible.
- (d) Locations for installing continuous monitoring systems or monitoring devices that vary from locations provided under the performance specifications of 40 CFR 60, Appendix B, shall be approved by the IDEM, OAQ, VCAPC, and the US EPA upon a demonstration by the owner or operator that installation at alternative locations will enable accurate and representative measurements.
- (e) Owners or operators of affected facilities shall conduct continuous emission monitoring system performance evaluations, upon the request of the IDEM, OAQ and VCAPC, to demonstrate continuing compliance of the continuous emission monitoring systems according to the specifications in 326 IAC 3-5-2(7)(A), (B) and (C).

D.4.14 Continuous Opacity Monitor - Certification [326 IAC 3-5-3]

- (a) The owner or operator shall conduct the applicable performance specifications tests in accordance with the procedures specified in 40 CFR 60, or other applicable federal regulations, for the required monitoring system as follows:

- (1) Not later than one hundred eighty (180) days after a facility start-up or initial monitor installation date.
 - (2) Not later than forty-five (45) unit operating days after monitor replacement date, or significant monitor repair as described in IDEM's Quality Assurance Manual, Chapter 20 (dated June 20, 1997), which affects the ability of the analyzer to function date.
- (b) No less than fourteen (14) days in advance of the start of continuous opacity monitor (COM) certification the Permittee shall notify the IDEM, OAQ and VCAPC.
 - (c) The Permittee shall submit all the required test data and information in the form of a written report to the IDEM, OAQ and VCAPC for review and approval within forty-five (45) days of completion of the performance specification test.
 - (d) The IDEM, OAQ and VCAPC shall issue a written notice of certification status upon review of the compliance certification test report. A required monitoring system is certified when the department issues a certification letter stating that the applicable components, has satisfactorily met all federal and state monitoring requirements.
 - (e) The IDEM, OAQ and VCAPC may decertify a required monitoring system if an audit or performance evaluation reveals that such monitoring system or a component thereof does not meet applicable performance specifications or requirements. The owner or operator shall repeat the certification process for the required monitoring system within forty-five (45) days of the date of the department's decertification of the required monitoring system.

D.4.15 Continuous Opacity Monitor - Standard Operating Procedures [326 IAC 3-5-4]

- (a) The Permittee, on October 11, 2000 submitted to the IDEM, OAQ and VCAPC a complete, written continuous monitoring standard operating procedures (SOP) for the Continuous Opacity Monitor for Boiler #8 which is consistent with 326 IAC 3-5-4(a). If revisions are made to the SOP, updates shall be submitted to IDEM, OAQ and VCAPC biennially. As a minimum the SOP shall contain complete step-by-step procedures as outlined in 326 IAC 3-5-4(a)(1) through (10).
- (b) If the Permittee submits a revised SOP that fails to address the factors provided in (a) above, then IDEM, OAQ and VCAPC may require a performance evaluation.

D.4.16 Continuous Opacity Monitor - Quality Assurance Requirements [326 IAC 3-5-5]

- (a) For calibration drift (CD) assessment, the COMS shall be checked at least once daily. The CD shall be quantified and recorded at zero (0) (or low level) and upscale level opacity. The COMS shall be adjusted whenever the CD exceeds the specification of 40 CFR 60, Appendix B, Performance Specification 1 (PS-1), and the COMS shall be declared out of control when the CD exceeds twice the specification of PS-1. Corrective actions, followed by a validating CD assessment, are required when the COMS is out of control.
- (b) For fault indicators assessment, the fault lamp indicators, data acquisition system error messages, and other system self-diagnostic indicators shall be checked at least daily. Appropriate corrective actions shall be taken when the COMS is operating outside the preset limits.
- (c) For performance audits, checks of the individual COMS components and factors affecting the accuracy of the monitoring data, as described in this subdivision, shall be conducted, at a minimum, on a calendar quarter basis. The absolute minimum checks included in the performance audit are as follows:
 - (1) The status of the optical alignment of the monitor components shall be checked and recorded according to the procedure specified by the monitor manufacturer. Monitor components must be realigned as necessary.
 - (2) The apparent effluent opacity shall be compared and recorded before and after cleaning each of the exposed optical surfaces. The total optical surface dust accumulation shall be determined by summing up the apparent reductions in

opacity for all of the optical surfaces that are cleaned. Caution must be employed in performing this check since fluctuations in effluent opacity occurring during the cleaning cycle may adversely affect the results.

- (3) The zero (0) and upscale response errors shall be determined and recorded according to the CD procedures. The errors are defined as the differences (in percent opacity) between the correct value and the observed value for the zero (0) and high level calibration checks.
 - (4) The value of the zero (0) compensation applied at the time of the audit shall be calculated as equivalent opacity, corrected to stack exit conditions, according to the procedures specified by the manufacturer. The compensation applied to the effluent recorded by the monitor system shall be recorded.
 - (5) The optical pathlength correction ratio (OPLR) shall be computed from the monitor pathlength and stack exit diameter and shall be compared, and the difference recorded, to the monitor setup OPLR value. The stack exit correlation error shall be determined as the absolute value of the difference between the measured value and the corrected value, expressed as a percentage of the correct value.
 - (6) A three-point calibration error test of the COMS shall be conducted. Three (3) neutral density filters meeting the requirements of PS-1 shall be placed in the COMS light beam path. The monitor response shall be independently recorded from the COMS permanent data recorder. Make a total of five (5) nonconsecutive readings for each filter. The low-range, mid-range, and high-range calibration error results shall be computed as the mean difference and ninety-five percent (95%) confidence interval for the difference between the expected and the actual responses of the monitor as corrected to stack exit conditions. These values shall be calculated using the procedure of PS-1, Section 8.0. The following are requirements for these values:
 - (A) The calibration error test required the installation of an external calibration audit device (zero-jig). The zero-jig shall be adjusted to provide the same zero (0) response as the monitor's simulated zero (0).
 - (B) Use calibration attenuators, that is, neutral density filters or screens, with values that have been determined according to PS-1, Section 7.1.3, "Attenuator Calibration", and produce simulated opacities (as corrected to stack exit conditions) in the ranges listed in Table 1-2 in PS-1.
 - (C) The stability of the attenuator values shall be checked at least once per year according to the procedures specified in PS-1. The attenuators shall be recalibrated if the stability checks indicate a change of 2% opacity or greater.
- (d) The following are requirements for monitor acceptance criteria:
- (1) The following criteria are to be used for determining if the COMS audit results are acceptable:

Stack Exit Correlation Factor	# 2 percent
Zero and Upscale Responses	# 2 percent opacity
Zero Compensation	# 4 percent opacity
Optical Alignment	Misalignment error
	# 2 percent opacity
Optical Surface Dust Accumulation	# 4 percent opacity
Calibration Error	# 3 percent opacity
 - (2) The COMS is out of control whenever the results of a quarterly performance audit indicate noncompliance with any of the performance assessment criteria above. If the COMS is out of control, the owner or operator must take the action necessary to eliminate the problem. Following corrective action, the source owner or operator must reconduct the appropriate failed portion of the audit and other applicable portions to determine whether the COMS is operating properly and within specifications. The COMS owner or operator shall record both audit results showing the COMS to be out of control and the results following the corrective action. COMS data obtained during any out of control period may not

be used for compliance determination; the data may be used for identifying periods where there has been a failure to meet quality assurance and control criteria.

- (3) Repeated audit failures, that is, out of control conditions resulting from the quarterly audits, indicate that the QC procedures are inadequate or the COMS is incapable of providing quality data. The source owner or operator shall increase the frequency of the above QC procedures until the performance criteria are maintained or modify or replace the COMS whenever two (2) consecutive quarters of unacceptable performance occur.

- (e) The performance audit calculations contained in PS-1, Section 8 shall be followed.

D.4.17 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) In the event of opacity exceeding twenty percent (20%) average opacity for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below twenty percent. Examples of expected response steps include, but are not limited to, boiler loads being reduced, and baghouse compartments being returned to service.
- (b) Opacity readings in excess of twenty percent (20%) but not exceeding the opacity limit for the unit are 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 violation of this permit.

D.4.18 Visible Emissions Notations

Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour 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 primary COM. 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 Method 9 opacity observations within four hours of the second abnormal notation.
 - (C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.
- (2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, 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 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 malfunction or down time.
 - (B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.

- (C) Method 9 readings may be discontinued once a COM is online.
 - (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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 Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.4.19 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ related fuel usage limits and/or the SO₂ emission limits established in Condition D.4.3. Records necessary to demonstrate compliance shall be available within 30 days of each compliance period.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications, which shall include:
- (i) The name of the fuel supplier; and
 - (ii) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records for Boiler #8 in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance in accordance with Condition D.4.5 procedures with the Sulfur Dioxide (SO₂) emission limit established in Condition D.4.3.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal usage since last compliance determination period;
 - (3) Sulfur content, heat content, and ash content (as received basis);
 - (4) Sulfur Dioxide emission rates;
- (c) To document compliance with Condition D.4.10, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the monitoring requirements established in Condition D.4.10.
- (1) Calendar dates covered in the compliance monitoring period;
 - (2) Date and time of each pressure drop reading;

- (3) Actual pressure drop reading, along with a notation indicating if the reading is in the acceptable range; and
 - (4) Any corrective actions taken as a result of readings outside the acceptable range.
- (d) To document compliance with the inspection provisions on D.4.7 and D.4.11, the Permittee shall maintain records including the date of the inspection, the findings of the inspection, and any PMP or CRP related actions as a result of the inspection.
- (e) To document compliance with Conditions D.4.9, D.4.13, D.4.14, D.4.15, and D.4.16, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the monitoring requirements established in Conditions D.4.13, D.4.14, D.4.15, and D.4.16
 - (1) On and after the certification of a monitoring system, the owner or operator of a source subject to this rule shall maintain records, including raw data, of all monitoring data and supporting information for a minimum of five (5) years from the date of the following:
 - (A) A monitoring sample.
 - (B) A measurement.
 - (C) A test.
 - (D) A certification.
 - (E) A report.
 - (F) Any other activity required under this article.
 - (2) The records described in subsection (1) shall include the following:
 - (A) All documentation relating to:
 - (i) design, installation, and testing of all elements of the monitoring system; and
 - (ii) required corrective action or compliance plan activities.
 - (B) All maintenance logs, calibration checks, and other required quality assurance activities.
 - (C) All records of corrective and preventive action.
 - (D) A log of plant operations, including the following:
 - (i) Date of facility downtime.
 - (ii) Time of commencement and completion of each downtime.
 - (iii) reason for each downtime.
 - (3) The owner or operator of a source subject to this rule shall maintain the records required by this section at the source, or at such other site, in a manner so that they may be inspected by the IDEM, OAQ, VCAPC or the US EPA, if so requested or required.
- (f) To document compliance with Condition D.4.4, the Permittee shall maintain records for Boiler #8 in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the limit on chlorine content of coal combusted in boiler #8.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal usage since last compliance determination period;
 - (3) Chlorine content, heat content, and ash content (as received basis);
 - (4) Chlorine input during compliance period;
 - (5) Hydrogen Chloride emission rates.
- (g) Pursuant to 326 IAC 3-7-5(a), the Permittee has developed 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 3-7-3. Any revision to the SOP shall be submitted to IDEM, OAQ and

VCAPC.

- (h) To document compliance with Condition D.4.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (i) To document compliance with Section C - Opacity and Conditions D.4.2 and D.4.18, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.4.2 and D.4.18.
 - (1) Data and results from the most recent stack test;
 - (2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5;
 - (3) The results of all visible emission (VE) notations and Method 9 visible emission readings taken during any periods of COM downtime; and
 - (4) All baghouse parametric monitoring readings.
- (j) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.20 Reporting Requirements - COM audits [326 IAC 3-5-5(e)]

Pursuant to 326 IAC 3-5-5(e) reporting requirements for performance audits on the continuous opacity monitoring system are as follows:

- (a) Owners or operators of facilities required to conduct continuous opacity monitor calibration error audits on continuous emission monitors shall prepare a written report of the results of the performance audit for each calendar quarter. Quarterly reports shall be submitted to the IDEM, OAQ and VCAPC within thirty (30) calendar days after the end of each quarter.
- (b) The performance audit report shall contain the following information:
 - (1) Plant and monitor information, including the following:
 - (A) The plant name and address.
 - (B) The monitor brand, model, and serial number.
 - (C) The monitor span.
 - (D) The monitor location, for example, duct, boiler, unit, or stack designation.
 - (2) Performance audit information, including the following:
 - (A) The auditor's name.
 - (B) A copy of the audit standard's certification, for example, the vendor's Protocol 1 certification, or neutral density filter certification.
 - (C) All data used to calculate the audit results.
 - (D) The audit results and an indication if the monitor passed or failed the audit. If the performance audit results show the COMS to be out of control, the COMS owner or operator must report both the audit results showing the COMS to be out of control and the results of the audit following the corrective action showing the COMS to be operating within specification.
 - (E) Any corrective actions performed as the result of a failed audit.

D.4.21 Reporting Requirements - Continuous Opacity Monitoring [326 IAC 3-5-7]

Pursuant to 326 IAC 3-5-7(Reporting requirements) the following reporting requirements apply to sources subject to this rule:

- (a) Excess emissions shall be reported no less frequently than quarterly. For sources required to report quarterly, such reports shall be:
 - (1) submitted by the Permittee to the IDEM, OAQ and VCAPC; and
 - (2) postmarked or delivered by other means no later than thirty (30) calendar days

following the last day of the reporting period.

- (b) The monitoring report shall contain the following continuous monitoring information summaries, with all times reported in real time.
 - (1) Monitored facility operation time during the reporting period:
 - (2) Excess emissions or parameters, as applicable, reported in units of the standard, or the applicable parameter unit as follows:
 - (A) Date of excess emissions, or other applicable dates.
 - (B) Time of commencement and completion for each applicable parameter deviation or excess emission data.
 - (3) Magnitude of each excess emission as follows:
 - (A) The actual percent opacity of all six (6) minute (block) averages exceeding the applicable opacity limit shall be reported. If the exceedance occurs continuously beyond one (1) six (6) minute period, the percent opacity for each six (6) minute average or the highest six (6) minute average opacity for the entire period shall be reported.
 - (B) A summary by cause shall be prepared and submitted as part of this report itemizing exceedances by cause.
- (c) Continuous monitoring system instrument downtime except for zero (0) and span checks, which shall be reported separately, 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 systems repairs and adjustments.

D.4.22 Reporting Requirements

- (a) The natural gas boiler certification shall be submitted semi-annual to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) A quarterly summary of the information to document compliance with Conditions D.4.3 and D.4.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

CERTIFICATION

Source Name: Pfizer Inc
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address: P.O. Box 88, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-7586-00013

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.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

**VIGO COUNTY AIR POLLUTION CONTROL
103 South 3rd Street
Terre Haute, Indiana 47807**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Pfizer Inc
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address: P.O. Box 88, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-7586-00013

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p>☛ This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), within four (4) business hours (IDEM: 1-800-451-6027 or 317-233-5674, ask for Compliance Section and VCAPC: 812-462-3433); andC The Permittee must submit notice in writing or by facsimile within two (2) days (IDEM Facsimile Number: 317-233-5967 and VCAPC Facsimile Number: 812-462-3433), 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

Page 2 of 2

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 ₂ , VOC, NO _x , 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: _____

A certification is not required for this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Pfizer Inc
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address: PO Box 88, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-7586-00013

<input checked="" type="checkbox"/> Natural Gas Only
<input checked="" type="checkbox"/> Alternate Fuel burned
From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Pfizer Inc
 Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
 Mailing Address: PO Box 88, Terre Haute, Indiana 47808
 Source Modification No.: 167-12343-00013
 Facility: Boiler B-1
 Parameter: Fuel Oil Use Limitation
 Limit: 233,800 gallons per 12-consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Gallons of #2 Fuel Oil This Month	Gallons of #2 Fuel Oil Previous 11 Months	Gallons of #2 Fuel Oil 12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Pfizer Inc
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address: PO Box 88, Terre Haute, Indiana 47808
Source Modification No.: 167-12343-00013
Facility: Boiler B-2
Parameter: Fuel Oil Use Limitation
Limit: 233,800 gallons per 12-consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Gallons of #2 Fuel Oil This Month	Gallons of #2 Fuel Oil Previous 11 Months	Gallons of #2 Fuel Oil 12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Pfizer Inc
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address: PO Box 88, Terre Haute, Indiana 47808
Source Modification No.: 167-12343-00013
Facility: Boiler #9
Parameter: Fuel Oil Use Limitation
Limit: 2,526,000 gallons per 12-consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Gallons of #2 Fuel Oil This Month	Gallons of #2 Fuel Oil Previous 11 Months	Gallons of #2 Fuel Oil 12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Pfizer Inc
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address: P.O. Box 88, Terre Haute, Indiana 47808
Source Modification No.: 167-15658-00013
Facility: Boiler #8
Limit: 9.43 tons of Chlorine in the coal fed to Boiler #8 per 12-consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Tons of Chlorine in the Coal This Month	Tons of Chlorine in the Coal Previous 11 Months	Tons of Chlorine in the Coal 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

and VIGO COUNTY AIR POLLUTION CONTROL

Part 70 Quarterly Report

Source Name: Pfizer Inc
Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address: P.O. Box 88, Terre Haute, Indiana 47808
Source Modification No.: 167-15658-00013
Facility: Boiler #8
Limit: SO₂ emissions - 3.01 lb/MMBtu heat input

YEAR: _____

Month	Coal Usage (tons)	% Sulfur content of Coal	Heat content of Coal	Equivalent SO ₂ emissions (lb/MMBtu)
Month 1				
Month 2				
Month 3				

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Note: Please attach coal analysis or vender certification.

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

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

Source Name: Pfizer Inc
 Source Address: 100 Pfizer Drive, Terre Haute, Indiana 47802
 Mailing Address: P.O. Box 88, Terre Haute, Indiana 47808
 Part 70 Permit No.: T167-7586-00013

Months: _____ **to** _____ **Year:** _____

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
<p>Permit Requirement (specify permit condition #)</p>	
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:	
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
and
VIGO COUNTY AIR POLLUTION CONTROL**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Pfizer Inc
Source Location: 100 Pfizer Drive, Terre Haute, Indiana 47802
County: Vigo
SIC Code: 2833
Operation Permit No.: T167-7586-00013
Permit Reviewer: Darren Woodward

The Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) has reviewed a Part 70 permit application from Pfizer, Inc. relating to the operation of a stationary batch pharmaceutical manufacturing operation facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) subbituminous coal fired boiler, identified as boiler #8, with No. 1 distillate fuel, No. 6 residual oil, natural gas, and liquefied petroleum gas as backup fuel. Maximum capacity of 150 million (MM) Btu per hour heat input when using coal, No. 1 fuel oil, No. 6 fuel oil, with supplemental natural gas and liquefied petroleum gas burners of 40 million (MM) Btu per hour heat input capacity. Boiler #8 uses a baghouse for control, is equipped with a continuous opacity monitor, and emissions exhaust to stack 1. Boiler #8 was installed in 1981.
- (b) One (1) pharmaceutical manufacturing operation, identified as BLDG 1247, for sterile products. This facility includes process tanks and vessels, sterilization filters, a crystallizer, a centrifuge, product dryers, mills and packaging equipment. Emissions exhausting to stacks 3 and 4. BLDG 1247 was constructed in 1981.
- (c) A steam boiler manufactured by Cleaver-Brooks, identified as B-1. A maximum heat input capacity of 14.625 million BTU per hour, fired on either natural gas or #2 fuel oil, utilizing low NOx burners for control and exhausting through stack B-1. Boiler B-1 was installed in 2000.
- (d) A steam boiler manufactured by Cleaver-Brooks, identified as B-2. A maximum heat input capacity of 14.625 million BTU per hour, fired on either natural gas or #2 fuel oil, utilizing low NOx burners for control and exhausting through stack B-2. Boiler B-2 was installed in 2000.
- (e) A fuel oil storage tank, identified as Bldg 551, with a maximum capacity of 14,000 gallons, utilizing no control and venting to the atmosphere. Bldg 551 was constructed in 2000.
- (f) A 70,000 pound of steam per hour boiler manufactured by Volcano Technologies, identified as TEMP, constructed in 2000 with a maximum heat input capacity of 95.5 million BTU per hour when burning natural gas and 91.2 million BTU per hour when burning #2 fuel oil, utilizing low NOx burners for control and exhausting through stack 5. The TEMP boiler was constructed in 2000.
- (g) A steam boiler, identified as Boiler #9, with a maximum heat input rating of 98.0 million

BTU per hour, utilizing natural gas and #2 fuel oil for fuel (propane as a pilot only when natural gas is not available), using low NOx burners and flue gas recirculation for control, and exhausting to stack 1. Boiler #9 was constructed in 2003.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. [326 IAC 6-1-2]
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour. [326 IAC 6-1]
- (c) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. [326 IAC 6-1-2]
- (d) 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.
- (e) Combustion source flame safety purging on startup.
- (f) 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.
- (g) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (h) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (j) Refractory storage not requiring air pollution control equipment.
- (k) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (l) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (m) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (n) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (o) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (p) Closed loop heating and cooling systems.
- (q) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (r) 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.
- (s) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (t) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (u) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (v) Heat exchanger cleaning and repair.

- (w) Process vessel degassing and cleaning to prepare for internal repairs.
- (x) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-1-2].
- (y) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (z) Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day [326 IAC 6-4].
- (aa) Uncovered coal conveying of less than or equal to 120 tons per day [326 IAC 6-4].
- (bb) Underground conveyors.
- (cc) Coal bunker and coal scale exhausts and associated dust collector vents.
- (dd) Asbestos abatement projects regulated by 326 IAC 14-10.
- (ee) 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.
- (ff) 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.
- (gg) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (hh) On-site fire and emergency response training approved by the department.
- (ii) Emergency generators as follows:
 - (A) Gasoline generators not exceeding 110 horsepower.
 - (B) Diesel generators not exceeding 1600 horsepower.
 - (C) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (jj) Other emergency equipment as follows:
 - (A) Stationary fire pumps.
- (kk) Purge double block and bleed valves.
- (ll) Filter or coalescer media changeout.
- (mm) Vents from ash transport systems not operated at positive pressure.
- (nn) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (oo) Farm Operations
- (pp) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP. Hydrochloric acid storage and handling operations associated with pharmaceutical manufacturing (HCL emissions)
- (qq) Other activities or categories not previously identified:
 - (1) 30,000 bbl fixed-roof storage tank with No. 6 fuel oil
 - (2) Pharmaceutical production processes in Building 1133, 1163, 1164, 1166, 1167, 1168, 1169, 1172, 1175, 1187, 1193, 1238, 1243, 1244, 1247 and 1250, including all storage tanks associated with the listed buildings.
- (rr) Animal Health Research and Development Area, including livestock shelters, feed processing and space heating operations.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Operating Permit 13-2834-04-93, issued on 1/14/93
- (b) Operating Permit 13-2834-05-81, issued on 1/26/93
- (c) Operating Permit 13-2834-06-81, issued on 9/14/92
- (d) Interim Permit 167-12293I, issued on 6/2/2000,
- (e) MSM 167-12293, issued on 8/2/2000,
- (f) MSM 167-12343, issued on 8/8/2000,
- (g) AA 167-12620, issued on 10/11/2000,
- (h) SSM 167-14566, issued on 10/15/2001, and
- (i) SSM 167-15658, issued on 10/17/2002.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 17, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, page 1 through 11.

Potential To Emit

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

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

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	greater than 250
VOC	less than 25
CO	greater than 250
NO _x	greater than 250

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

HAP's	Potential To Emit (tons/year)
Hydrogen Chloride (HCL)	greater than 10
TOTAL	greater than 10

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO₂, CO, PM₁₀, and NO_x is equal to or greater than 100 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAQ 1999 emission data.

Pollutant	Actual Emissions (tons/year)
PM	4.13
PM-10	4.13
SO ₂	445.80

VOC	1.90
CO	NA
NO _x	194.50
Hydrogen Chloride (HCL)	7.0

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Vigo County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) Boiler #8 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.42b, Subpart Db) having a capacity range between 100 and 250 million Btu per hour, due to the date of construction (construction commenced before June 19, 1984).
- (b) The portable cold cleaner degreaser is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 12, (40 CFR 63.460, Subpart T), because Pfizer Inc does not use any Halogenated solvents.
- (c) Boilers B-1, B-2, TEMP, and Boiler #9 are subject to 40 CFR 60, Subpart Dc for the following reasons: the construction commenced after June 9, 1989 and they have a maximum design heat input capacity of 100 MM Btu per hour or less, but greater than or equal to 10 MM Btu per hour. Boilers B-1, B-2, #9, and TEMP are each subject to the following requirements:
 - 40 CFR 60.42c(d)
 - (1) The SO₂ emissions from the boilers shall not exceed five tenths (0.5) pounds per million Btu heat input; or

- (2) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (3) The sulfur content of the fuel oil for Boiler #9 only, shall not exceed five-hundredths percent (0.05%) by weight. Compliance with this limit will assure compliance with 40 CFR 60.42(c)(d).

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

40 CFR 60.48c(f)

- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification (as described in 40 CFR 60.48c(f)); or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (a) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (b) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling .

40 CFR 60.48c(g)

- (1) Pursuant to 40 CFR 60.48c(g), the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted each day.
- (2) Pursuant to 40 CFR 60.48c(i), all records required under this regulation shall be maintained by the owner or operator for a period of two years following the date of such record.

40 CFR 60.48c(a)

- (1) Pursuant to 40 CFR 60.48c(a), the Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:
 - (a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - (b) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 40 CFR 60.43c.
 - (c) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - (d) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of 40 CFR 60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

40 CFR 60.48c(b)

- (1) Pursuant to 40 CFR 60.48c(b) the Permittee shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS using the applicable performance specifications in Appendix B.

40 CFR 60.48c(d)

- (1) Pursuant to 40 CFR 60.48c(d) the Permittee shall submit quarterly reports to the Administrator. The initial quarterly report shall be postmarked by the 30th day of the third month following the completion of the initial performance test. Each subsequent quarterly report shall be postmarked by the 30th day following the end of the reporting period.

40 CFR 60.48c(e)

- (1) Pursuant to 40 CFR 60.48c(e) the Permittee shall keep records and submit quarterly reports as required above, including the following information:
 - (a) Calendar dates covered in the reporting period.
 - (b) Each 30-day average SO₂ emission rate (ng/J or lb/million BTU), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
 - (c) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1) of this section, as applicable. In addition to records of fuel supplier certifications, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.
- (d) The TEMP boiler and Boiler #9 are also subject to the following requirements:

40 CFR 60.43c(c)

- (1) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall not cause to be discharged into the atmosphere from this facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.
- (2) Pursuant to 40 CFR 60 Subpart Dc, the opacity standard applies at all times when burning #2 fuel oil, except during periods of startup, shutdown, or malfunction.

40 CFR 60.44c(b) and (h)

- (1) Pursuant to 40 CFR 60, Subpart Dc, the first day of the initial performance test shall be scheduled within 30 days after the facility achieves the maximum production rate, but not more than 180 days after initial startup.
- (2) Pursuant to 40 CFR 60, Subpart Dc, where the Permittee seeks to demonstrate compliance with the SO₂ standards based on fuel supplier

certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1).

40 CFR 60.45c(a)

- (a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall conduct an initial performance test for opacity as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using Method 9 (6 minute average of 24 observations) for determining the opacity of stack emissions. Testing shall be conducted in accordance with Section C-Performance Testing of the permit.

40 CFR 60.47c

- (a) The owner or operator of an affected facility combusting coal, residual oil, or wood that is subject to the opacity standards under § 60.43c shall install, calibrate, maintain, and operate a CEMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system.
- (b) All CEMS for measuring opacity shall be operated in accordance with the applicable procedures under Performance Specification 1 (appendix B). The span value of the opacity CEMS shall be between 60 and 80 percent.

- (e) A fuel oil storage tank, identified as Bldg 551, is subject to 40 CFR 60, Subpart Kb because the tank has a capacity greater than or equal to 40 cubic meters (53 m³), and the construction commenced after July 23, 1984. The requirements of this subpart are as follows:

40 CFR 60.116b(b)

- (1) Pursuant to 40 CFR 60.116b(b), the Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m³ is subject to no provision of this subpart other than those required by this paragraph.

- (f) Pfizer Inc is not subject to the following MACT requirements because Pfizer Inc is not a major source as defined in section 112(a) of the Act, due to the HCl limitation:

- (1) 40 CFR Part 63, Subpart GGG
- (2) 40 CFR Part 63, Subpart VV
- (3) 40 CFR Part 63, Subpart III
- (4) 40 CFR Part 63, Subpart NNN
- (5) 40 CFR Part 63, Subpart RRR
- (6) 40 CFR Part 63, Subparts H and I, and
- (7) 40 CFR Part 61

Pursuant to Significant Source Modification (SSM) 167-15658-00013 issued on October 17, 2002, the Chlorine content of the coal delivered to boiler #8 shall not exceed 9.43 tons per 12-consecutive month period, with compliance determined at the end of each month. This limitation, in combination with the miscellaneous emissions, restricts the potential emissions of HCl below 10 tons per year. Therefore, Pfizer Inc is not considered a major source for Hazardous Air Pollutants (HAPs) and is not subject to 40 CFR Part 63, Subpart GGG National Emission Standards for Pharmaceuticals Production, or any other NESHAP.

- (g) The source is not subject to any other NSPS/NESHAPs.

326 IAC 2-2 (Prevention of Significant Deterioration)

The PSD trigger date used to appear under 326 IAC 2-2-2(b)(1), however that rule language has been removed. The underlying federal provisions still exist though {specifically 40 CFR 52.21(i)(4)(i)} and that exempts sources and modifications which commenced construction prior to August 7, 1977. All of the emission units at Pfizer Inc were installed after the trigger date. Excluding boiler #8 and BLDG 1247, the other emission units were specifically reviewed by this agency and issued appropriate approvals.

Pfizer Inc was established pre-1977 and is considered to be a major source. The following modifications are minor modifications, or Pfizer Inc took emission limitations so that PSD requirements would not apply:

- Significant Source Modification for boiler #8 regarding the HCL limit, 167-15658;
- Minor Source Modification for boilers B-1, B-2, and Building 551, 167-12343;
- Minor Source Modification for TEMP boiler, 167-12293; and
- Significant Source Modification for boiler #9, 167-14566.

Process/facility	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Boiler #5 (const. 1967, has been removed)	31.0	26.7	393	138	NA	12.5
Boiler #6 (const. 1971, has been removed)	24.9	21.5	316	111	NA	10.1
Boiler #7 (const. 1971, has been removed)	24.9	21.5	316	111	NA	10.1
Boiler #8 (const. 1981)	470 (4.7)	177 (1.77)	2450 (limit 1978)	222	1.47	176
BLDG 1247 (const. 1981)	NA	NA	NA	NA	4.8	NA
Boiler B-1 (const. 2000)	1.51 (limit 0.193)	1.51 (limit 0.193)	32.3 (limit 4.13)	15.7 (limit 2.01)	1.56 (limit 0.199)	9.60
Boiler B-2 (const. 2000)	1.51 (limit 0.193)	1.51 (limit 0.193)	32.3 (limit 4.13)	15.7 (limit 2.01)	1.56 (limit 0.199)	9.60
Bldg 551 (const. 2000)	NA	NA	NA	NA	0.008	NA
TEMP Boiler (const. 2000) emissions = the combination of nat.gas and fuel oil (25 days), total)	1.13	3.61	14.1	23.4	2.30	35.1
Boiler #9 (const. 2003)	6.1 (limit 3.00)	10.1 (limit 6.10)	218 (limit 9.10)	60.1 (limit 39.9)	2.40	79.4

This source is a major source and the following equipment have limits such that PSD rules, 326 IAC 2-2 shall not apply:

Boiler #8:

The construction permit for Boiler #8 was issued by VCAPC in November 1980. The Air Pollution Control Division of the Indiana State Board of Health (ISBH) was consulted by VCAPC prior to, and approved of, its issuance of the permit. At the time of issuance, Vigo County was classified as nonattainment for SO₂ and TSP. In August, 1980, EPA had published its final rules for NSR which were intended to reflect the holding of the Alabama Power decision. These rules allowed for netting of contemporaneous emission decreases and increases at a source with potential emissions from a proposed modification to the

source to determine major NSR applicability.

The netting analysis developed by VCAPC for the proposed construction of Boiler #8 was based on the shutdown of existing oil-fired boilers 5, 6, and 7 while Boiler #8 was in operation. With respect to SO₂, VCAPC utilized source specific allowable emissions for the three existing boilers, based on the SO₂ SIP for Vigo County, as the baseline for the netting analysis in lieu of actual past emissions, as the rules allowed at the discretion of the permitting agency. This resulted in no net increase in emissions of SO₂. At the time, the use of source specific allowable emissions was appropriate in this case given that the modeled attainment demonstration supporting the SIP in question incorporated the allowable emissions for the existing boilers. The same approach was taken for TSP with the further proviso that future potential emissions from Boiler #8 would be based on enforceable controls (baghouse). This approach was permissible under the state emission offset rule in place at the time, as well, which exempted the construction of sources with less than 50 tons per year increase in allowable emissions. NO_x limits were established in a similar basis with respect to PSD. All other criteria pollutants were less than the PSD significant thresholds.

The Boiler #8 construction permit was revised by VCAPC in 1985, after consultation with the ISBH and with EPA, Region 5, to allow limited concurrent operation of one of the preexisting oil-fired boilers with Boiler #8. The netting analysis for this permit revision was conducted in the same fashion as before. In accordance with the suggestion of EPA, Region 5, a revision to the construction permit was used, rather than a SIP rule revision, to defect the change.

BLDG 1247:

One (1) pharmaceutical manufacturing operation, identified as BLDG 1247, for sterile products. This facility includes process tanks and vessels, sterilization filters, a crystallizer, a centrifuge, product dryers, mills and packaging equipment. Emissions exhausting to stacks 3 and 4. BLDG 1247 was constructed in 1981.

The emissions from BLDG 1247 are to be considered insignificant, therefore, 326 IAC 2-2 is not applicable.

Boilers B-1 and B-2:

The SO₂ and NO_x emissions are limited to less than 40 tons/yr, therefore, PSD requirements do not apply. This limit is equivalent to no more than 233,800 gallons of #2 fuel oil fired in Boilers B-1 and B-2, each.

Boilers B-1 and B-2 have a #2 fuel oil limitation of 233,800 gallons per 12-consecutive month period, each with compliance determined at the end of each month. The potential emissions of Boilers B-1 and B-2 are well below the PSD Significant Thresholds, therefore, 326 IAC 2-2 is not applicable.

The fuel oil usage for boilers B-1 and B-2 shall be limited to less than 233,800 gallons of #2 fuel oil each per 12-consecutive month period, with compliance determined at the end of each month. The limitations of this Condition keep the potential emissions from boilers B-1 and B-2, in the aggregate, below 25 tons per year of NO_x and SO₂. This limit will assure compliance with Minor Source Modification 167-12343-00013.

Bldg 551:

A fuel oil storage tank, identified as Bldg 551, with a maximum capacity of 14,000 gallons, utilizing no control and venting to the atmosphere. Bldg 551 was constructed in 2000.

The emissions from Bldg 551 are to be considered insignificant, therefore, 326 IAC2-2 is not applicable.

Bldg 551 is not subject to 326 IAC 8-4 or 326 IAC 8-9 for the following reasons: Pfizer Inc is not a Petroleum refinery; gasoline terminal or transport; and has a capacity less than

39,000 gallons. Pfizer Inc is located in Vigo County, therefore, 326 IAC 8-9 does not apply.

TEMP boiler:

The SO₂ and NO_x emissions are limited to less than 40 tons/yr, therefore, PSD requirements do not apply. This limit is equivalent to no more than 390,860 gallons of #2 fuel oil fired in the Boiler Temp per 12 consecutive month period, with compliance determined at the end of each month.

The fuel oil usage from the TEMP boiler shall be limited to less than 390,860 gallons of #2 fuel oil per 12-consecutive month period, with compliance determined at the end of each month, with the balance of the year utilizing natural gas. The potential emissions of the TEMP boiler is well below the PSD Significant Threshold, therefore, 326 IAC 2-2 is not applicable

Boiler #9:

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Boiler #9 has fuel oil limitation of 2,526,000 gallons per 12-consecutive month period with compliance determined at the end of each month. The calculated NO_x emissions of 39.9 TPY are below the PSD Significant Threshold of 40 TPY, therefore, 326 IAC 2-2 is not applicable.

The Sulfur Dioxide (SO₂) emissions are limited both by the fuel oil use limitation above, and a maximum sulfur content in the fuel oil of 0.05% by weight. Pfizer Inc. specifically requested that this limitation be included in this approval and be made Federally Enforceable.

326 IAC 2-4.1-1 [New source toxics control]

Pfizer Inc is not subject to the requirements of 326 IAC 2-4.1-1 because Boiler #8 was constructed before July 27, 1997. The other facilities at this source do not emit significant levels of HAPs, therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-7-5(13) [Preventive Maintenance Plan]

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

326 IAC 2-6 [Emission Reporting]

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of Carbon Monoxide, oxides of nitrogen, particulate matter, or sulfur dioxide. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 [Opacity Limitations]

Pfizer Inc is located outside of the coordinates that limits the opacity to thirty percent (30%). Therefore, Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

326 IAC 8-1-6 [New facilities; general reduction requirements]

Pfizer Inc is not subject to the requirements of 326 IAC 8-1-6 because their potential emissions of volatile organic compounds (VOC) are less than 25 tons per year.

326 IAC 8-5-3 [Synthesized pharmaceutical manufacturing operations]

Pfizer Inc is not subject to the requirements of 326 IAC 8-5-3 because they do not use chemical synthesis to manufacture pharmaceutical products.

Chlorine Content Limitation:

- (1) Pursuant to Part 70 Significant Source Modification 167-15658-00013, the Chlorine content of the coal delivered to boiler #8 shall not exceed 9.43 tons per 12-consecutive month period, with compliance determined at the end of each month.

The baghouse controlling PM emissions shall be in operation at all times that the boiler is operating on coal.

- (2) This limitation, in combination with the miscellaneous emissions, restricts the potential emissions of HCl below 10 tons per year. Therefore, Pfizer Inc is not considered a major source for Hazardous Air Pollutants (HAPs) and is not subject to 40 CFR Part 63, Subpart GGG National Emission Standards for Pharmaceuticals Production, or any other NESHAP.

Pfizer requested issuance of a Significant Source Modification before October 21, 2002, the Pharmaceutical MACT compliance deadline, for an enforceable emission limitation of hydrogen chloride (HCl) which will make Pfizer's source a synthetic minor with respect to emission of HAPs. None of the other various HAPs emitted by the combustion of coal in the boiler show that a significant level of emissions will be reached. Therefore, hydrogen chloride is the only HAP to be examined here.

The HCl emissions come from the operation of Boiler #8 and from various miscellaneous minor and insignificant facilities. The minor facilities include bioprocessing, laboratories, cleaning and maintenance, and wastewater operations. These minor facilities amount to approximately 0.3 tons of HCl per year.

There are no other facilities with single HAP emissions greater than 10 tons per year or a combination of HAP emissions greater than 25 tons per year. Therefore, to prevent the HCl emissions from being greater than 10 tons per year, the Boiler #8's HCl emissions would have to be held to less than 9.7 (10 - 0.3) tons per year.

The coal contains levels of chlorine (Cl) that forms hydrogen chloride when the coal is burned. Therefore, the content must be limited to stay below the singular HAP threshold. The weight limit on Chlorine in the coal combusted is determined by multiplying the desired HCL limit (9.7 TPY) by the ratio of the molecular weight of Chlorine to the molecular weight of Hydrogen Chloride (35.5/36.5). The limit is 9.43 TPY Chlorine in the coal combusted. This limitation, in combination with the miscellaneous emissions, keeps the potential emissions below (10) tons per year of HCl. Therefore, Pfizer Inc is not considered a major source for Hazardous Air Pollutants (HAPs) and is not subject to 40 CFR Part 63, Subpart GGG National Emission Standards for Pharmaceuticals Production, or any other NESHAP.

The Chlorine content of coal samples shall be determined in accordance with either the procedures specified in ASTM D2361, Standard Test Methods for Chlorine in Coal, or the procedures specified in ASTM D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method.

State Rule Applicability - Individual Facilities

Boiler #8:

326 IAC 2-7-6(1),(6), 326 IAC 2-1.1-11 [Testing Requirements]

Due to the size and potential to emit (PTE), during the period between 30 and 36 months after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform PM and PM-10 testing for Boiler #8 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

326 IAC 6-1-2(b) [Particulate Matter Limitation (PM)]

This source is subject to 326 IAC 6-1-2(b) (Particulate Matter Limitation (PM)), because Pfizer Inc is located in Vigo County and has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to 326 IAC 6-1-2(b), Boiler #8 (150 MMBtu/hr using coal, 40 MMBtu/hr using #1 or #6 fuel oil, and LPG), shall not discharge or cause to be discharged any gases unless such gases are limited to:

- (a) Pursuant to 326 IAC 6-1-2(b)(1)(B), a particulate matter content of no greater than 0.35 pounds per million Btu for solid fuel fired generators of equal to or greater than 25 but less than 250 million Btu.
- (b) Pursuant to 326 IAC 6-1-2(b)(2), a particulate matter content of no greater than 0.15 pounds per million Btu for all liquid fuel-fired steam generators.
- (c) Pursuant to 326 IAC 6-1-2(b)(3), a particulate matter content of no greater than 0.01 grain per dry standard cubic foot (dscf) for all gaseous fuel-fired steam generators.

326 IAC 7-2 [Sulfur Dioxide (SO₂) Emissions and Sulfur Content]

This source is subject to 326 IAC 7-2 (Sulfur Dioxide (SO₂) Emissions and Sulfur Content), because Pfizer Inc has the potential to emit twenty five (25) tons or more of sulfur dioxide per year. Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions from Boiler #8 shall not exceed 3.01 pounds per million BTU. Compliance shall be determined utilizing one of the following options:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:
 - (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 three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);
 - (3) Sample and analyze the coal pursuant to 236 IAC 3-7-3; or

Preparation of the coal sample heat content analysis, and sulfur content analysis under any of these three methods shall be determined pursuant to 326 IAC 3-7-2(c), (d), and (e).

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 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(b)]

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

326 IAC 7-4-3 [Sulfur dioxide]

Pursuant to 326 IAC 7-4-3, the SO₂ emissions from Boiler #8 shall be limited to 3.01 pounds per million (MM) Btu heat input.

Boilers B-1 and B-2:

326 IAC 2-7-10.5(d)(5) [Fuel Oil Use Limitation]

The fuel oil usage for boilers B-1 and B-2 shall be limited to less than 233,800 gallons of #2 fuel oil each per 12-consecutive month period, with compliance determined at the end of each month. The limitations of this Condition keep the potential emissions from boilers B-1 and B-2, in the aggregate, below 25 tons per year of NO_x and SO₂. This limit will assure compliance with Minor Source Modification 167-12343-00013.

326 IAC 6-1-2(b) [Particulate Matter Limitation (PM)]

This source is subject to 326 IAC 6-1-2(b) (Particulate Matter Limitation (PM)), because Pfizer Inc is located in Vigo County and has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to 326 IAC 6-1-2(b), Boilers B-1 and B-2 (14.625 MMBtu/hr each using natural gas and #2 fuel oil), shall not discharge or cause to be discharged any gases unless such gases are limited to:

- (a) Pursuant to 326 IAC 6-1-2(b)(2), a particulate matter content of no greater than 0.15 pounds per million Btu for all liquid fuel-fired steam generators.
- (b) Pursuant to 326 IAC 6-1-2(b)(3), a particulate matter content of no greater than 0.01 grain per dry standard cubic foot (dscf) for all gaseous fuel-fired steam generators.

326 IAC 7-1.1-1, 326 IAC 12-1, 40 CFR 60.42c(d) [Sulfur Dioxide (SO₂)]

This source is subject to 326 IAC 7-1.1-1 (Sulfur Dioxide (SO₂)), because Pfizer Inc has the potential to emit twenty five (25) tons or more of sulfur dioxide per year. Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from boilers B-1 and B-2 shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

326 IAC 7-4-3 [Sulfur dioxide]

Boilers B-1 and B-2 are not subject to 326 IAC 7-4-3 because they were constructed after this rule was established.

TEMP boiler:

326 IAC 2-7-10.5(d)(5) [Fuel Oil Use Limitation]

The fuel oil usage for the TEMP boiler shall be limited to less than 390,860 gallons of #2 fuel oil per 12-consecutive month period, with compliance determined at the end of each month. This limitation keeps the potential emissions below 25 tons per year of NO_x and SO₂. This limitation will assure compliance with Minor Source Modification 167-12293-00013.

326 IAC 6-1-2(b) [Particulate Matter Limitation (PM)]

This source is subject to 326 IAC 6-1-2(b) (Particulate Matter Limitation (PM)), because Pfizer Inc is located in Vigo County and has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to 326 IAC 6-1-2(b), the TEMP boiler (95.5 MMBtu/hr when using natural gas, and 91.2 when using #2 fuel oil) shall not discharge or cause to be discharged any gases unless such gases are limited to:

- (a) Pursuant to 326 IAC 6-1-2(b)(2), a particulate matter content of no greater than 0.15 pounds per million Btu for all liquid fuel-fired steam generators.
- (b) Pursuant to 326 IAC 6-1-2(b)(3), a particulate matter content of no greater than 0.01 grain per dry standard cubic foot (dscf) for all gaseous fuel-fired steam generators.

326 IAC 7-1.1-1, 326 IAC 12-1, 40 CFR 60.42c(d) [Sulfur Dioxide (SO₂)]

This source is subject to 326 IAC 7-1.1-1 (Sulfur Dioxide (SO₂)), because Pfizer Inc has the potential to emit twenty five (25) tons or more of sulfur dioxide per year. Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the TEMP boiler shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

326 IAC 7-4-3 [Sulfur dioxide]

The TEMP boiler is not subject to 326 IAC 7-4-3 because it was constructed after this rule was established.

Boiler #9:

326 IAC 6-1-2(b) [Particulate Matter Limitation (PM)]

This source is subject to 326 IAC 6-1-2(b) (Particulate Matter Limitation (PM)), because Pfizer Inc is located in Vigo County and has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to 326 IAC 6-1-2(b), Boiler #9 (98 MMBtu/hr using natural gas and #2 fuel oil, and propane as a pilot only when natural gas is not available), shall not discharge or cause to be discharged any gases unless such gases are limited to:

- (a) Pursuant to 326 IAC 6-1-2(b)(2), a particulate matter content of no greater than 0.15 pounds per million Btu for all liquid fuel-fired steam generators.
- (b) Pursuant to 326 IAC 6-1-2(b)(3), a particulate matter content of no greater than 0.01 grain per dry standard cubic foot (dscf) for all gaseous fuel-fired steam generators.

326 IAC 7-1.1-1, 326 IAC 12-1, 40 CFR 60.42c(d) [Sulfur Dioxide (SO₂)]

This source is subject to 326 IAC 7-1.1-1 (Sulfur Dioxide (SO₂)), because Pfizer Inc has the potential to emit twenty five (25) tons or more of sulfur dioxide per year. Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from Boiler #9 shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (c) The sulfur content of the fuel oil for Boiler #9 only, shall not exceed five-hundredths percent (0.05%) by weight. This rule, in combination with the fuel oil usage limitation,

shall make 326 IAC 2-2 not applicable.

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

326 IAC 7-4-3 [Sulfur dioxide]

Boiler #9 is not subject to 326 IAC 7-4-3 because it was constructed after this rule was established.

Cold Cleaner Degreasers:

326 IAC 8-3-2 [Cold cleaner operation]

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation) for new facilities constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) 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.

326 IAC 8-3-5 [Cold cleaner degreaser operation and control]

Pfizer Inc is not subject to the requirements of 326 IAC 8-3-5 because the operation was constructed before July 1, 1990.

The following rules apply to the corresponding insignificant activity:

326 IAC 6-1-2 [Particulate Matter]

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (c) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

326 IAC 6-4 [Fugitive Dust Emissions]

- (a) Paved and unpaved roads and parking lots with public access.
- (b) Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day.
- (c) Uncovered coal conveying of less than or equal to 120 tons per day.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in

conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

1. Boilers B-1, B-2, and TEMP have applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of stacks B-1 and B-2 shall be performed during normal daylight operations when boilers B-1 or B-2 are combusting fuel oil. A trained employee will record whether emissions are normal or abnormal. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) Once per shift visible emissions notations of stack 5 shall be performed during normal daylight operations when the TEMP boiler is combusting fuel oil. A trained employee will record whether emissions are normal or abnormal. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (c) Once per shift visible emissions notations of stack 1 shall be performed during normal daylight operations when boiler #9 is combusting fuel oil. A trained employee will record whether emissions are normal or abnormal. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
2. Boiler #8 has applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with Boiler #8, at least once per shift when Boiler #8 is in operation when venting to the atmosphere. 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 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 violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and VCAPC and shall be calibrated at least

once every six (6) months.

- (b) 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.
- (c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.
 - (1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.
 - (2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.
 - (3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.
- (d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5.

These monitoring conditions are necessary because the control equipment for the boilers must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Matter Emissions), and the New Source Performance Standards (NSPS).

326 IAC 3-5-1(c)(2)(a) [Continuous Monitoring of Emissions]

This source is subject to 326 IAC 3-5-1(c)(2)(a) (Continuous Monitoring of Emissions), because Boiler #8 uses fuel oil as a backup and has a heat input capacity of greater than a hundred million Btu per hour (100,000,000 Btu/hr). Pursuant to this rule, the Permittee shall continuously monitor the breaching from the Boiler #8 baghouse for opacity emissions whenever Boiler #8 is operating on coal except for periods of (i) performance audits required under this Section, and (ii) daily zero and span.

326 IAC 3-5-2 [Continuous Opacity Monitor - Performance]

- (a) Performance specifications set forth in 40 CFR 60 Appendix B, shall be used to certify monitoring equipment installed pursuant to this rule; however, where reference is made to the administrator in 40 CFR 60, Appendix B, the term "department" shall be inserted for purposes of this rule.
- (b) The cycling time for the opacity monitor shall not exceed ten (10) seconds. The cycling time is the total time a monitoring system requires to sample, analyze, and record an emission measurement.
- (c) Instrument full-scale response or upper limit of concentration measurement range for all opacity monitoring systems shall be set at one hundred percent (100%) opacity if possible.
- (d) Locations for installing continuous monitoring systems or monitoring devices that vary from locations provided under the performance specifications of 40 CFR 60, Appendix B, shall be approved by the IDEM, OAQ, VCAPC, and the US EPA upon a demonstration by the owner or operator that installation at alternative locations will enable accurate and representative measurements.

- (e) Owners or operators of affected facilities shall conduct continuous emission monitoring system performance evaluations, upon the request of the IDEM, OAQ and VCAPC, to demonstrate continuing compliance of the continuous emission monitoring systems according to the specifications in 326 IAC 3-5-2(7)(A), (B) and (C).

326 IAC 3-5-3 [Continuous Opacity Monitor - Certification]

- (a) The owner or operator shall conduct the applicable performance specifications tests in accordance with the procedures specified in 40 CFR 60, or other applicable federal regulations, for the required monitoring system as follows:
 - (1) Not later than one hundred eighty (180) days after a facility start-up or initial monitor installation date.
 - (2) Not later than forty-five (45) unit operating days after monitor replacement date, or significant monitor repair as described in IDEM's Quality Assurance Manual, Chapter 20 (dated June 20, 1997), which affects the ability of the analyzer to function date.
- (b) No less than fourteen (14) days in advance of the start of continuous opacity monitor (COM) certification the Permittee shall notify the IDEM, OAQ and VCAPC.
- (c) The Permittee shall submit all the required test data and information in the form of a written report to the IDEM, OAQ and VCAPC for review and approval within forty-five (45) days of completion of the performance specification test.
- (d) The IDEM, OAQ and VCAPC shall issue a written notice of certification status upon review of the compliance certification test report. A required monitoring system is certified when the department issues a certification letter stating that the applicable components, has satisfactorily met all federal and state monitoring requirements.
- (e) The IDEM, OAQ and VCAPC may decertify a required monitoring system if an audit or performance evaluation reveals that such monitoring system or a component thereof does not meet applicable performance specifications or requirements. The owner or operator shall repeat the certification process for the required monitoring system within forty-five (45) days of the date of the department's decertification of the required monitoring system.

326 IAC 3-5-4 [Continuous Opacity Monitor - Standard Operating Procedures]

- (a) The Permittee, on October 11, 2000 submitted to the IDEM, OAQ and VCAPC a complete, written continuous monitoring standard operating procedures (SOP) for the Continuous Opacity Monitor for Boiler #8 which is consistent with 326 IAC 3-5-4(a). If revisions are made to the SOP, updates shall be submitted to IDEM, OAQ and VCAPC biennially. As a minimum the SOP shall contain complete step-by-step procedures as outlined in 326 IAC 3-5-4(a)(1) through (10).
- (b) If the Permittee submits a revised SOP that fails to address the factors provided in (a) above, then IDEM, OAQ and VCAPC may require a performance evaluation.

326 IAC 3-5-5 [Continuous Opacity Monitor - Quality Assurance Requirements]

- (a) For calibration drift (CD) assessment, the COMS shall be checked at least once daily. The CD shall be quantified and recorded at zero (0) (or low level) and upscale level opacity. The COMS shall be adjusted whenever the CD exceeds the specification of 40 CFR 60, Appendix B, Performance Specification 1 (PS-1), and the COMS shall be declared out of control when the CD exceeds twice the specification of PS-1. Corrective actions, followed by a validating CD assessment, are required when the COMS is out of control.
- (b) For fault indicators assessment, the fault lamp indicators, data acquisition system error messages, and other system self-diagnostic indicators shall be checked at least daily. Appropriate corrective actions shall be taken when the COMS is operating outside the preset limits.

- (c) For performance audits, checks of the individual COMS components and factors affecting the accuracy of the monitoring data, as described in this subdivision, shall be conducted, at a minimum, on a calendar quarter basis. The absolute minimum checks included in the performance audit are as follows:
- (1) The status of the optical alignment of the monitor components shall be checked and recorded according to the procedure specified by the monitor manufacturer. Monitor components must be realigned as necessary.
 - (2) The apparent effluent opacity shall be compared and recorded before and after cleaning each of the exposed optical surfaces. The total optical surface dust accumulation shall be determined by summing up the apparent reductions in opacity for all of the optical surfaces that are cleaned. Caution must be employed in performing this check since fluctuations in effluent opacity occurring during the cleaning cycle may adversely affect the results.
 - (3) The zero (0) and upscale response errors shall be determined and recorded according to the CD procedures. The errors are defined as the differences (in percent opacity) between the correct value and the observed value for the zero (0) and high level calibration checks.
 - (4) The value of the zero (0) compensation applied at the time of the audit shall be calculated as equivalent opacity, corrected to stack exit conditions, according to the procedures specified by the manufacturer. The compensation applied to the effluent recorded by the monitor system shall be recorded.
 - (5) The optical pathlength correction ratio (OPLR) shall be computed from the monitor pathlength and stack exit diameter and shall be compared, and the difference recorded, to the monitor setup OPLR value. The stack exit correlation error shall be determined as the absolute value of the difference between the measured value and the corrected value, expressed as a percentage of the correct value.
 - (6) A three-point calibration error test of the COMS shall be conducted. Three (3) neutral density filters meeting the requirements of PS-1 shall be placed in the COMS light beam path. The monitor response shall be independently recorded from the COMS permanent data recorder. Make a total of five (5) nonconsecutive readings for each filter. The low-range, mid-range, and high-range calibration error results shall be computed as the mean difference and ninety-five percent (95%) confidence interval for the difference between the expected and the actual responses of the monitor as corrected to stack exit conditions. These values shall be calculated using the procedure of PS-1, Section 8.0. The following are requirements for these values:
 - (A) The calibration error test required the installation of an external calibration audit device (zero-jig). The zero-jig shall be adjusted to provide the same zero (0) response as the monitor's simulated zero (0).
 - (B) Use calibration attenuators, that is, neutral density filters or screens, with values that have been determined according to PS-1, Section 7.1.3, "Attenuator Calibration", and produce simulated opacities (as corrected to stack exit conditions) in the ranges listed in Table 1-2 in PS-1.
 - (C) The stability of the attenuator values shall be checked at least once per year according to the procedures specified in PS-1. The attenuators shall be recalibrated if the stability checks indicate a change of 2% opacity or greater.
- (d) The following are requirements for monitor acceptance criteria:
- (1) The following criteria are to be used for determining if the COMS audit results are acceptable:

Stack Exit Correlation Factor	# 2 percent
Zero and Upscale Responses	# 2 percent opacity
Zero Compensation	# 4 percent opacity
Optical Alignment	Misalignment error
	# 2 percent opacity
Optical Surface Dust Accumulation	# 4 percent opacity
Calibration Error	# 3 percent opacity

- (2) The COMS is out of control whenever the results of a quarterly performance audit indicate noncompliance with any of the performance assessment criteria above. If the COMS is out of control, the owner or operator must take the action necessary to eliminate the problem. Following corrective action, the source owner or operator must reconduct the appropriate failed portion of the audit and other applicable portions to determine whether the COMS is operating properly and within specifications. The COMS owner or operator shall record both audit results showing the COMS to be out of control and the results following the corrective action. COMS data obtained during any out of control period may not be used for compliance determination; the data may be used for identifying periods where there has been a failure to meet quality assurance and control criteria.
- (3) Repeated audit failures, that is, out of control conditions resulting from the quarterly audits, indicate that the QC procedures are inadequate or the COMS is incapable of providing quality data. The source owner or operator shall increase the frequency of the above QC procedures until the performance criteria are maintained or modify or replace the COMS whenever two (2) consecutive quarters of unacceptable performance occur.

- (e) The performance audit calculations contained in PS - 1

326 IAC 3-5-5(e) [Reporting Requirements - COM audits]

Pursuant to 326 IAC 3-5-5(e) reporting requirements for performance audits on the continuous opacity monitoring system are as follows:

- (a) Owners or operators of facilities required to conduct continuous opacity monitor calibration error audits on continuous emission monitors shall prepare a written report of the results of the performance audit for each calendar quarter. Quarterly reports shall be submitted to the IDEM, OAQ and VCAPC within thirty (30) calendar days after the end of each quarter.
- (b) The performance audit report shall contain the following information:
 - (1) Plant and monitor information, including the following:
 - (A) The plant name and address.
 - (B) The monitor brand, model, and serial number.
 - (C) The monitor span.
 - (D) The monitor location, for example, duct, boiler, unit, or stack designation.
 - (2) Performance audit information, including the following:
 - (A) The auditor's name.
 - (B) A copy of the audit standard's certification, for example, the vendor's Protocol 1 certification, or neutral density filter certification.
 - (C) All data used to calculate the audit results.
 - (D) The audit results and an indication if the monitor passed or failed the audit. If the performance audit results show the COMS to be out of control, the COMS owner or operator must report both the audit results showing the COMS to be out of control and the results of the audit following the corrective action showing the COMS to be operating within specification.
 - (E) Any corrective actions performed as the result of a failed audit.

326 IAC 3-5-7 [Reporting Requirements - Continuous Opacity Monitoring]

Pursuant to 326 IAC 3-5-7(Reporting requirements) the following reporting requirements apply to sources subject to this rule:

- (a) Excess emissions shall be reported no less frequently than quarterly. For sources required to report quarterly, such reports shall be:
 - (1) submitted by the Permittee to the IDEM, OAQ and VCAPC; and
 - (2) postmarked or delivered by other means no later than thirty (30) calendar days following the last day of the reporting period.

- (b) The monitoring report shall contain the following continuous monitoring information summaries, with all times reported in real time.
 - (1) Monitored facility operation time during the reporting period:
 - (2) Excess emissions or parameters, as applicable, reported in units of the standard, or the applicable parameter unit as follows:
 - (A) Date of excess emissions, or other applicable dates.
 - (B) Time of commencement and completion for each applicable parameter deviation or excess emission data.
 - (3) Magnitude of each excess emission as follows:
 - (A) The actual percent opacity of all six (6) minute (block) averages exceeding the applicable opacity limit shall be reported. If the exceedance occurs continuously beyond one (1) six (6) minute period, the percent opacity for each six (6) minute average or the highest six (6) minute average opacity for the entire period shall be reported.
 - (B) A summary by cause shall be prepared and submitted as part of this report itemizing exceedances by cause.

- (c) Continuous monitoring system instrument downtime except for zero (0) and span checks, which shall be reported separately, 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 systems repairs and adjustments.

Conclusion

The operation of this stationary batch pharmaceutical manufacturing facility shall be subject to the conditions of the attached proposed **Part 70 Permit No. T167-7586-00013**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Part 70 Operating Permit and Technical Support Document

Source Name:	Pfizer Inc
Source Location:	100 Pfizer Drive, Terre Haute, IN 47802
County:	Vigo
SIC Code:	2833
Operation Permit No.:	T167-7586-00013
Permit Reviewer:	Darren Woodward

On October 25, 2003, the Office of Vigo County Air Pollution Control (VCAPC) had a notice published in the Tribune Star, Terre Haute, Indiana, stating that Pfizer Inc had applied for a Part 70 Operating Permit to operate a stationary batch pharmaceutical manufacturing operation facility. The notice also stated that VCAPC 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 November 24, Pfizer Inc submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Table of Contents

Comment 1:

Pfizer Inc suggested that 326 IAC 6-1-2 be used for the citation on Page 3 (now Page 4) of the draft permit for Condition D.4.2 (originally D.1.2).

Response to Comment 1:

This change will be incorporated into the final Part 70 permit.

~~D.4.2~~ **D.4.2** Particulate Limitations [326 IAC ~~6-1-13~~ **6-1-2(b)**]

Comment 2:

Pfizer Inc suggested that on Page 4 of the draft permit in the heading for Section D.4 (now renumbered as D.1), "A portable, closed top..." be revised to "Portable, closed top..." since there are more than one such cleaner at the Pfizer plant.

Response to Comment 2:

This change will be incorporated into the final Part 70 permit.

~~D.4~~ **D.1 FACILITY OPERATION CONDITIONS - A pPortable, closed top, cold cleaner degreasers....**

Section A of the Draft Permit

Comment 3:

Pfizer Inc pointed out that there was a typo on Page 7 of the draft permit (insignificant activities) in which (pp) contained some of the same language as (qq). They suggested that the language be deleted from (pp).

Response to Comment 3:

This change will be incorporated into the final Part 70 permit.

- (pp) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP. ~~Hydrochloric acid storage and handling operations associated with pharmaceutical manufacturing (HCL emissions)~~
- (qq) Hydrochloric acid storage and handling operations associated with pharmaceutical manufacturing, referred to herein as Miscellaneous HCl emissions, including:
- (1) HCl used to regenerate the ion exchange towers in Bioprocessing operations;
 - (2) Use of HCl as reagent in very small quantities in laboratory operations;
 - (3) Use of HCl for heavy duty cleaning in very small quantities in cleaning and maintenance operations; and
 - (4) Presence of HCl in small concentrations, as result of Bioprocessing operations, in wastewater processed in the wastewater treatment plant.

Comment 4:

Pfizer Inc pointed out two typos on Page 7 of the draft permit. In (qq) "herin" should be "herein" and "HCL" should be "HCl".

Response to Comment 4:

These changes will be incorporated into the final Part 70 permit.

- (qq) Hydrochloric acid storage and handling operations associated with pharmaceutical manufacturing, referred to ~~herin~~ **herein** as Miscellaneous ~~HCL~~ **HCl** emissions, including:

Section B of the Draft Permit

Comment 5:

Pfizer Inc suggested that in Condition B.8 (c), the reference to "section B, Emergency Provisions" could be more precisely stated as "Condition B.12, Emergency Provisions".

Response to Comment 5:

This change will be incorporated into the final Part 70 permit.

- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in ~~section B~~ **Condition B.12**, Emergency Provisions.

Comment 6:

Pfizer Inc suggested that the following language be added to Condition B.10, "...standards, or work practices. **The initial annual certification submitted on July 1 of the year following issuance of the permit shall cover the time period from the effective date of the permit to December 31. All subsequent certifications shall cover...**".

Response to Comment 6:

The permit becomes effective upon final issuance of the permit through December 31 of the same year. The condition has been updated as follows:

....standards, or work practices. **The initial certification submitted on July 1 of the year following issuance of the permit shall cover the time period from the date of final permit issuance through December 31 of the same 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:

Comment 7:

Pfizer Inc stated that language has been inadvertently omitted from Condition B.11, subcondition (a) on page 11 of the draft permit. With the omission restored, the paragraph would read as follows:

“...the Permittee shall **prepare, within ninety (90) days after the effective date of this permit, and** maintain and implement Preventive Maintenance Plans (PMPs)...”.

Response to Comment 7:

This change will be incorporated into the final Part 70 permit.

- (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:

Comment 8:

Pfizer Inc believes that in Condition B.12, subcondition (h), which requires the permittee to report emergencies in the Quarterly Deviation and Compliance Monitoring Report, is in **conflict** with 326 IAC 2-7-16(b)(5). They believe the rule provision states that provision of written notice to the IDEM Commissioner under the emergency procedures of 326 IAC 2-7-16(b)(5) fulfills the requirements for deviation reporting under 326 IAC 2-7-5(3)(C)(ii). Thus, Condition B.12(h) should be deleted from the draft permit.

Response to Comment 8:

Paragraph (b)(5) of Condition B.12 pertains to the reporting of emergencies lasting at least one hour; these emergencies must be reported in an Emergency Occurrence Report Form within two days of the emergency and do not have to be certified by the Responsible Official. Paragraph (h) of Condition B.12 was intended to address the reporting of other types of emergencies that are not required to be reported pursuant to paragraph (b)(5) and to provide the Responsible Official's certification of previously reported emergencies. In order to clarify this paragraph, IDEM and VCAPC have revised the language as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

-
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. **Any emergencies that have been previously reported pursuant to Paragraph (b)(5) of this condition and certified by the Responsible Official need only be referenced by the date of the original report.**

Comment 9:

Pfizer Inc believes that in Condition B.17(d), subcondition (d) of Condition B.17 is superfluous and should be deleted from the draft permit. This subcondition speaks to certain options that U.S. EPA may invoke under Title V in the event of a failure by state and local agencies to timely act upon a renewal of the permit. Such options are solely a matter of federal discretion and prerogative which exist under federal law regardless of what the state-issued Title V permit says.

Response to Comment 9:

IDEM and VCAPC includes this provision to ensure that the source is aware of EPA's authority; however, it may be removed at the Permittee's request. Accordingly, VCAPC has made the following revision to the permit:

~~(d) — United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ and VCAPC, fail 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.~~

SECTION C of the Draft Permit

Comment 10:

Pfizer supports the inclusion of this affirmative defense provision in the draft permit. There are three minor editorial comments that Pfizer offers regarding Condition C.11(c):

- (i) In paragraph (c)(1), an extraneous "a" should be deleted from the third line between "the" and "malfunction."
- (ii) Paragraph (c)(4) could be more simply worded in the following manner:

"The Permittee shall include each malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity lasting one (1) day or more in the Quarterly Deviation and Compliance Monitoring Report and must include the following:"

- (iii) The last two subconditions should be renumbered as (d) and (e).

Response to Comment 10:

There is nothing in 326 IAC 3-5 that provides an affirmative defense for monitor downtime. IDEM and VCAPC cannot provide an affirmative defense in the permit when the rule doesn't allow it. Therefore, this change will **not** be incorporated into the final Part 70 permit. Additionally, IDEM and VCAPC feel the latest COM language is more appropriate. Therefore the new COM language will be incorporated into the Title V permit.

Condition C.11 has been revised to the following:

~~C.11 — Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]~~

~~(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, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~And~~

~~Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807~~

~~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) 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.~~
- ~~(c) A malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity constitutes an affirmative defense for noncompliance with the continuous monitoring requirements of 326 IAC 3-5 or the compliance monitoring requirements included in Section D of this permit, if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:~~
- ~~(1) A malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity occurred and the Permittee can, to the extent possible, identify the causes of or reasons for the malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity;~~
 - ~~(2) The permitted facility was at the time being properly operated;~~
 - ~~(3) During the period of a malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity, 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 malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity lasting one (1) day or more, the Permittee shall include all malfunctions, out of control periods, calibration and adjustment activities, repairs or maintenance activities in the Quarterly Deviation and Compliance Monitoring Report and must include the following:~~
 - ~~(i) A description of the malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity;~~
 - ~~(B) Any steps taken to mitigate the emissions; and~~
 - ~~(C) Corrective actions taken.~~
 - ~~(5) The Permittee immediately took all reasonable steps to correct the malfunction or out of control period and completed the calibration and adjustment activity, repair or maintenance activity in a timely manner.~~
- ~~(d) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity has the burden of proof.~~
- ~~(e) IDEM, OAQ, and VCAPC may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9), Operation, Maintenance and Monitoring Plan required under 40 CFR 63 or the Startup, Shutdown and Malfunction plan required under 40 CFR 63.6(e)(3) be revised in response to a malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity.~~

- (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. Section C.12 (Maintenance of Continuous Opacity Monitoring Equipment) establishes the general operation and maintenance requirements for continuous emission monitoring systems and continuous opacity monitoring systems.
- (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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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.

Comment 11:

Pfizer supports the inclusion of this affirmative defense provision in the draft permit. There are three minor editorial comments that Pfizer offers in regard to this provision (Condition C.12(e)):

- (i) In the opening paragraph of subcondition (e), a phrase appears to be omitted, based on a comparison of this provision and Condition C.11. Thus, in the third line of the opening paragraph, the phrase “or the compliance monitoring requirements included in Section D of this permit” should be inserted immediately after “326 IAC 3-5”.
- (ii) In paragraph (e)(1), an extraneous “a” should be deleted from the third line between “the” and “malfunction.”
- (iii) Paragraph (e)(4) could be more simply worded in the following manner:

“The Permittee shall include each malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity lasting one (1) day or more in the Quarterly Deviation and Compliance Monitoring Report and must include the following:”.

Response to Comment 11:

There is nothing in 326 IAC 3-5 that provides an affirmative defense for monitor downtime. IDEM and VCAPC cannot provide an affirmative defense in the permit when the rule doesn't allow it. Therefore, this change will **not** be incorporated into the final Part 70 permit. Additionally, IDEM and VCAPC feel the latest COM language is more appropriate. Therefore the new COM language will be incorporated into the Title V permit.

Condition C.12 has been revised to the following:

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

- ~~(a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COM shall be in operation at all times that the induced draft fan is in operation.~~
- ~~(b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification 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 time and reason of the breakdown and efforts made to correct the problem.~~
- ~~(d) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour 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 primary COM. 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 Method 9 opacity observations within four hours of the second abnormal notation.~~

~~(C) — VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.~~

~~(2) — If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, 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 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 malfunction or down time.~~

~~(B) — Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.~~

~~(C) — Method 9 readings may be discontinued once a COM is online.~~

~~(D) — Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.~~

~~(3) — If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C — Compliance Response Plan — Preparation, Implementation, Records, and Reports. 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 Section C — Compliance Response Plan — Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~(e) — Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60.~~

C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 2-1.1-11] [326 IAC 3-5]

(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:

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

and

**Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807**

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 opacity monitoring systems (COMS) and related equipment in accordance with applicable federal regulations and 326 IAC 3-5.**
- (c) This provision applies only to COMS operated solely for monitoring compliance with limitations. The continuous opacity monitoring systems shall be operated at all times the emissions unit or process is operating as specified in Section D, except reasonable periods of necessary continuous opacity monitoring system calibration or maintenance activities. Continuous opacity monitoring system 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) **With the exception to (c) of this condition, nothing in this condition shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system at all times pursuant to 40 CFR 63.1209, and 40 CFR 63.8.**

Comment 12:

Pfizer Inc believes that Condition C.17, Paragraph (a)(2) of this permit Condition, as drafted, contains a requirement for revision to the Compliance Response Plan which is overbroad and could lead to counterproductive and inefficient results. In a hypothetical circumstance in which Pfizer attempted to return a deviation back to a compliant condition through the use, on a trial basis, certain response steps not in its current Compliance Response Plan, Condition C.17(a)(2) would require Pfizer to amend its Response Plan to incorporate such trial response steps whether or not they proved beneficial or effective. Pfizer asks that this provision be revised to require amendment of the Compliance Response Plan only if ad hoc response steps are found to be effective or useful. The provision as proposed would read as follows;

“If, at any time, the Permittee takes reasonable response steps that **(A)** are not set forth in the Permittee’s current Compliance Response Plan, **(B) the Permittee finds to be effective or useful, and (C) are documented by** the Permittee in accordance with subsections (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps.

Response to Comment 12:

Condition C.17(a)(2) has been revised to the following:

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee’s current Compliance Response Plan, and the Permittee documents such response in accordance with subsections (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken **that the Permittee finds to be effective or useful.**

Comment 13:

Pfizer Inc requested that the newly revised Indiana regulation 326 IAC 2-6, Emissions Statement Rule, which becomes effective March 27, 2004, be incorporated into the Title V permit.

Response to Comment 13:

Condition C.19 has been revised to the following:

C.19 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) The Permittee shall submit an ~~annual~~ emission statement certified pursuant to the requirements of 326 IAC 2-6, ~~that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of ~~criteria~~ pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (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 purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

The statement must be submitted to:

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

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

~~(eb)~~ The annual 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 and VCAPC, on or before the date it is due.

SECTION D of the Draft Permit:

Comment 14, General Comment on Section D:

Pfizer respectfully requests consideration by VCAPC for a reorganization of SECTION D in which: (i) the emission limitations, compliance determination and monitoring provisions and reporting/recordkeeping provisions for Boiler #8 would be combined with those pertaining to the TEMP boiler and Boiler #9 in a revised SECTION D.3; and (ii) SECTION D.4 be renumbered as SECTION D.1, which would still include Building 1247 in the Facility Description.

The reason for this request is that Pfizer is contemplating a sales transaction in which the main utility boilers – Boiler #8, Boiler #9, and the TEMP boiler – would be sold to another entity and would no longer be a part of Pfizer's plant. A reorganization of the SECTION D provisions involving these emission units would facilitate permit revisions associated with such a sales transaction. Additionally, it is a logical reorganization in any event since these three boilers are interrelated in the purpose of providing steam for plant use and are all located in the same utility building structure. Relocating the cold cleaner degreaser provisions from SECTION D.4 to SECTION D.1 would be useful as well since these facilities will remain with Pfizer's plant regardless of the prospective sales transaction mentioned above. If the utility boilers are ultimately sold, all that would need to occur with respect to a revision of the permit (assuming it is reorganized as proposed here) would be to drop off SECTION D.3 and the remainder could stay intact with no other renumbering needed.

To facilitate implementation of this proposed revision to the draft permit, if favorable consideration is given by VCAPC, Pfizer is providing as an enclosure to these comments, a draft of SECTION D as proposed to be revised by Pfizer. As mentioned above, this enclosure also displays in blackline format the various substantive changes proposed by Pfizer in its comments on SECTION D. Pfizer could also make available an electronic version of the proposed revision to and reorganization of SECTION D.

Response to Comment 14:

VCAPC has switched Section D.1 with Section D.4 in the final Part 70 Permit. Pfizer stated that they were contemplating a sale of the following Boilers: Boiler #8, Boiler #9, and the TEMP Boiler. With this change (switching D.1 and D.4), VCAPC could just delete the last two D sections while D.1 and D.2 would remain the same. VCAPC feels that this would reduce the possibility of any errors that could come from the renumbering, etc. of combining the two D sections.

Comment 15:

Pfizer suggests that the heading for Condition D.1.2 (now renumbered as D.4.2) be revised to read as follows:

Particulate Matter (PM) Limitations [326 IAC 6-1-2(b)]

Response to Comment 15:

Condition D.4.2 will be revised to read as follows:

Particulate Rules, ~~Vigo County~~ **matter emission limitations** [326 IAC 6-1-2(b)]

Comment 16:

Condition D.1.5(c) (renumbered as D.4.5(c), an extraneous "and" should be deleted from between "coal heat content," and "sulfur dioxide emission rate".

Response to Comment 16:

This change will be incorporated into the final Part 70 permit.

- (c) Pursuant to 326 IAC 7-2-1(c)(2), the fuel combustion sources with total coal-fired heat input capacity greater than one hundred (100) and less than one thousand five hundred (1,500) million Btus per hour shall submit quarterly reports of the calendar month average coal sulfur content, coal heat content, ~~and~~ sulfur dioxide emission rate in pounds per million Btus and the total monthly coal consumption.

Comment 17:

Pfizer proposes that Condition D.1.9 (now renumbered as D.4.9) identify additional specific circumstances in which generation of COM data would not be expected. Pfizer concurs that the currently specified exceptions for periods of performance audits and daily zeroes and spans are warranted and appropriate. However, Pfizer believes that exceptions to the requirement for COM operation are similarly warranted for periods when preventive or corrective maintenance of the COM is called for under the SOP or when calibration and adjustment of the COM are necessary. If the SOP indicates a need for preventive or corrective maintenance of the COM and that maintenance activity would preclude use of the COM to generate monitoring data, it seems straightforward that periods of such maintenance activity should be an exception under this permit Condition.

In this regard, it may be observed that Performance Specification 1, 40 CFR Part 60, Appendix B, requires that, during the Conditioning Period and the Operational Test Period to be conducted after initial installation and setup of an COM, the COM must be generating monitoring data at all times except for times of instrument zero and upscale calibration (span) checks, and that no unscheduled maintenance, repair or adjustments be made during these two periods. However, PS-1 does not preclude maintenance periods after these two initial testing periods and, in fact, such periods of maintenance are contemplated

by the very requirement of 326 IAC 3-5-4(a) that the SOP provide for preventive and corrective maintenance. Consequently, it seems reasonable that an exception to COM operation be provided in Condition D.1.9 for such maintenance periods which preclude COM operation. See the blacklined draft permit.

Pfizer supports the affirmative defense added in Section C of the draft permit as helpful in mitigating compliance difficulties that may arise from the omission of the exceptions requested in this comment. However, an affirmative defense still assumes a violation in the first instance and Pfizer believes that the circumstances described in this comment should not be construed as violative of its compliance monitoring obligations under Title V of the Clean Air Act.

Response to Comment 17:

There is nothing in 326 IAC 3-5 that provides an affirmative defense for monitor downtime. IDEM and VCAPC cannot provide an affirmative defense in the permit when the rule doesn't allow it. Therefore, this change will **not** be incorporated into the final Part 70 permit.

Comment 18:

- (i) Pfizer believes that the permit should require parametric monitoring of pressure drop across the Boiler 8 baghouse ONLY when the COM is out of service for a period of 1 hour or more INSTEAD of at all times the Boiler is in operation. A requirement for such redundant compliance monitoring is certainly excessive with respect to Boiler #8, which is a highly compliant emission unit with a very effective, multi-compartment baghouse and which has a continuous opacity monitoring (COM) system in operation. Parametric monitoring, as with other types of surrogate monitoring, may make sense if there is no direct measurement and monitoring of the primary pollutant of concern. Here, such concerns are not applicable. During those rare circumstances when the COM is unavailable, the use of pressure drop monitoring would satisfactorily assure proper operation of the baghouse. See the attached blacklined draft Title V permit for suggested language.
- (ii) in the first paragraph of Condition D.1.10 (now renumbered as D.4.10), the phrase "and is combusting coal" should be inserted immediately after the phrase "when Boiler #8 is in operation" at the end of the first sentence; and
- (iii) In the last line of the first paragraph of Condition D.1.10, the term "violation of" should be deleted and replaced with "deviation from." This change would render Condition D.1.10 consistent with other provisions of the draft permit.

Response to Comment 18:

- (i) 326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM and VCAPC the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The baghouse must operate properly in order for the boiler to achieve compliance with the particulate limits. Therefore, IDEM and VCAPC believe it is reasonable and necessary to require the source to monitor the pressure drop periodically. This is independent of the opacity limits and monitoring. There has been no change to the permit as a result of this comment.

Further review of the required monitoring indicated it was not sufficient. The following condition (D.4.17) was incorporated into the permit to be used as a trigger for when to perform CRP.
Condition
D.4.18 was added as a backup plan to ensure compliance if the COM is down or malfunctioning.

D.4.17 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) In the event of opacity exceeding twenty percent (20%) average opacity for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports such that the cause(s) of the excursion are

identified and corrected and opacity levels are brought back below twenty percent. Examples of expected response steps include, but are not limited to, boiler loads being reduced, and baghouse compartments being returned to service.

- (b) Opacity readings in excess of twenty percent (20%) but not exceeding the opacity limit for the unit are 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 violation of this permit.**

D.4.18 Visible Emissions Notations

Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour 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 primary COM. 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 Method 9 opacity observations within four hours of the second abnormal notation.**
- (C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.**
- (2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, 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 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 malfunction or down time.**
- (B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.**
- (C) Method 9 readings may be discontinued once a COM is online.**
- (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.**
- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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 Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

Along with those conditions, the Record Keeping needed updated as well. The following has been added as D.4.19 (i):

(i) **To document compliance with Section C - Opacity and Conditions D.4.2 and D.4.18, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.4.2 and D.4.18.**

- (1) **Data and results from the most recent stack test;**
- (2) **All continuous opacity monitoring data, pursuant to 326 IAC 3-5;**
- (3) **The results of all visible emission (VE) notations and Method 9 visible emission readings taken during any periods of COM downtime; and**
- (4) **All baghouse parametric monitoring readings.**

(ii) After reviewing the calculations, D.4.10 shall be amended as follows:

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Boiler #8, at least once per shift when Boiler #8 is in operation **and is combusting coal or No. 6 fuel oil.**

(iii) This change will be incorporated into the final Part 70 permit.

Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

Comment 19:

With respect to a failure of a compartment of the baghouse for Boiler #8, this Condition should be revised in two respects:

(i) Since a COM is installed on Boiler #8 which can readily detect opacity exceedances, Boiler #8 should be allowed to continue to operate in event of a failure of a baghouse compartment, even if a minor level of visible emissions are observed, unless the COM indicates exceedances of the opacity standard are occurring. This can be provided for by the following revision in the third line of the main paragraph of this Condition:

“For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if: **(i)** there are no visible emissions; **(ii) the COM shows no exceedances whether or not visible emissions are present;** or **(iii)** the event qualifies as an emergency and the Permittee satisfies the emergency.

(ii) The last sentence of the main paragraph of this Condition should be revised such that the term “violation of” is deleted and replaced with “deviation from.” This change would achieve consistency with other Conditions of the draft permit:

Response to Comment 19:

The IDEM OAQ has determined that a source could have minimal visible emissions from their baghouse and still be in compliance. Therefore, Condition D.1.12 (now renumbered as D.4.12) will be revised to read as follows:

D.4.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions).~~ Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any

failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

If operations continue after bag failure is observed and it will be 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 and VCAPC 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.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

Comment 20:

Regarding Condition D.1.17 (now renumbered as D.4.19):

- (i) In the third line of paragraph (a) of this Condition, the phrase “—related fuel” should be added immediately after “SO₂” and before the phrase “usage limits”. The limits in question are not SO₂ usage limits but rather are fuel usage limits based on SO₂ content.
- (ii) Subparagraph (4) should be revised to read as follows:
(4) Fuel supplier certifications, **which shall include:**
(5) **(i)** The name of the fuel supplier; and
(6) **(ii)** A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (iii) In the first line of paragraph (b), the reference to Condition D.1.2 (now renumbered as D.4.2) should be corrected to read Condition D.1.3 (now renumbered as D.4.3).
- (iii) The numbering of the second paragraph (c) should be corrected to “(d)”.
- (v) The reference made in paragraph (e)(2) to “subsection (a)” is incorrect and should be revised to refer to “paragraph (1)”.
- (vi) In paragraph (h) the reference to Condition D.1.2 (now renumbered as D.4.2) appears to be in error. We suspect that a reference to Condition D.1.7 (now renumbered as D.4.7) was intended.

Response to Comment 20:

- (i) This change will be incorporated into the final Part 70 permit.
- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ **related fuel** usage limits and/or the SO₂ emission limits established in Condition D.4.3. Records necessary to demonstrate compliance shall be available within 30 days of each compliance period.
- (ii) This change will be incorporated into the final Part 70 permit.
- (4) Fuel supplier certifications, which shall include:
~~(5)~~**(i)** The name of the fuel supplier; and
~~(6)~~**(ii)** A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (iii) This change will be incorporated into the final Part 70 permit.
- (b) To document compliance with Condition ~~D.4.2~~ **D.4.3**, the Permittee shall maintain records for

Boiler #8 in accordance with (1) through (4) below.

- (iii) The numbering appears to be fine, therefore, no change in the final Part 70 permit was made.
- (v) This change will be incorporated into the final Part 70 permit.
- (2) The records described in subsection ~~(a)~~ **(1)** shall include the following:
 - (vi) This change will be incorporated into the final Part 70 permit.
 - (h) To document compliance with Condition ~~D.4.2~~ **D.4.7**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

Comment 21:

Condition D.1.20 (now renumbered as D.4.22), In paragraph (a) at the end of the fourth line, a “not” should be inserted for consistency with other, similar provisions of the draft permit so as to provide that the natural gas-fired boiler certification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Response to Comment 21:

The natural gas-fired boiler certification does require the certification by the responsible official, therefore, this change will not be incorporated into the final Part 70 permit.

Comment 22:

The reference to “40 CFR Part 60, Subpart Da” in Condition D.2.1 is believed to be in error. Pfizer suggests that a reference instead to “40 CFR Part 60, Subpart Dc” was intended.

Response to Comment 22:

This change will be incorporated into the final Part 70 permit.

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated under 326 IAC 12, apply to the boilers (B-1 and B-2) except when otherwise specified in 40 CFR Part 60, Subpart ~~Da~~ **Dc**.

Comment 23:

Pfizer Inc had the following corrections/suggestions for Condition D.2.8:

- (i) References in the first two sentences of paragraph (a) to items (1) through (6) are in error and should be corrected to refer to items (1) through (4).
- (ii) The reference in paragraph (a) to NOx emission limits is believed to be in error. The only emission limits set in Condition D.2.3 are for SO₂, based on 326 IAC 7-1.1 and the NSPS. We agree that the fuel oil usage limits in Condition D.2.4 are based on maintaining potential emissions within minor source modification levels for both SO₂ and NOx.
- (ii) In the second line of paragraph (b), the word “daylight” should be inserted immediately before “shift.”

Response to Comment 23:

- (i) This change will be incorporated into the final Part 70 permit.
- (a) To document compliance with Condition D.2.3, and D.2.4, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(4)** below.

- (ii) The emission limits are based on both SO₂ and NO_x, therefore, “related fuel” will be incorporated into D.2.8 (a) immediately after NO_x in order to give a clearer understanding.

Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ and NO_x **related fuel** usage limits and/or the SO₂ and NO_x emission limits established in Conditions D2.3 and D2.4.

- (iii) This change will be incorporated into the final Part 70 permit.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of stack B-1 and stack B-2, once per **daylight** shift.

Comment 24:

In the first line of paragraph (a) of Condition D.2.11, the phrase, “as modified by 326 IAC 12-1-2,” should be inserted immediately after “40 CFR 60.48c(a)”.

Response to Comment 24:

This change will be incorporated into the final Part 70 permit.

- (a) Pursuant to 40 CFR 60.48c(a), **as modified by 326 IAC 12-1-2**, the Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:

Comment 25:

In Condition D.3.1, The reference to “40 CFR Part 60, Subpart Da” is believed to be in error. Pfizer suggests that a reference instead to “40 CFR Part 60, Subpart Dc” was intended.

Response to Comment 25:

This change will be incorporated into the final Part 70 permit.

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated under 326 IAC 12, apply to Boiler #9 except when otherwise specified in 40 CFR Part 60, Subpart ~~Da~~ **Dc**.

Comment 26:

In Condition D.3.7 (now renumbered as D.3.5), a right-hand parenthesis should be inserted immediately after “Deterioration” in the fourth line of this Condition.

Response to Comment 26:

This change will be incorporated into the final Part 70 permit.

This limitation makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable (in combination with Condition D.3.3 above).

Comment 27:

In Condition D.3.11(now renumbered as D.3.9), in the first line of this Condition, the term “3226” should be corrected to state “326”.

Response to Comment 27:

This change will be incorporated into the final Part 70 permit.

Pursuant to 40 CFR 60, Subpart Dc (as modified by ~~3226~~ **326** IAC 12-1-2), the Permittee shall conduct an initial performance test for Boiler #9 for opacity as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the Commissioner, to determine compliance with the

standards using Method 9 (6-minute average of 24 observations) for determining the opacity of stack emissions.

Comment 28:

In Condition D.3.12 (now renumbered as D.3.10), in paragraph (e), the phrase “violation of” should be deleted and replaced with “deviation from” to achieve consistency with other conditions of the draft permit.

Response to Comment 28:

This change will be incorporated into the final Part 70 permit.

Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

Comment 29:

Prizer Inc has the following suggestions/corrections with Condition D.3.13 (now renumbered as D.3.11):

- (i) References in the first two sentences of paragraph (a) to items (1) through (6) are in error and should be corrected to refer to items (1) through (4).
- (ii) The reference in paragraph (a) to NO_x emission limits is believed to be in error. The only emission limits set in Conditions D.3.3 and D.3.4 are for SO₂, based on 326 IAC 7-1.1 and the NSPS. We agree that the fuel oil usage limits in Conditions D.3.6 and D.3.7 are based on maintaining potential emissions within minor source modification levels for the TEMP boiler and below PSD significance levels for both boilers for both SO₂ and NO_x.
- (iii) Paragraph (b) should be revised to read as follows:

“To document compliance with Condition D.3.12 (now renumbered as D.3.10), the Permittee shall maintain records of visible emission notations of the Temp **boiler** stack exhaust **and the Boiler #9 stack exhaust** once per **daylight** shift when combusting fuel oil.”

Response to Comment 29:

- (i) This change will be incorporated into the final Part 70 permit.
- (a) To document compliance with Condition D.3.3, D.3.4, D.3.6, and D.3.7, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(4)** below. Records maintained for (1) through ~~(6)~~ **(4)** shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ and NO_x related fuel usage limits and/or the SO₂ and NO_x emission limits established in Conditions D.3.3, D.3.4, D.3.6, and D.3.7.
- (ii) The emission limits are based on both SO₂ and NO_x, therefore, “related fuel” will be incorporated into D.3.13 (a) immediately after NO_x in order to give a clearer understanding.

Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ and NO_x **related fuel** usage limits and/or the SO₂ and NO_x emission limits established in Conditions D.3.3, D.3.4, D.3.6, and D.3.7.

- (iii) This change will be incorporated into the final Part 70 permit. The TEMP Boiler language has been withdrawn from the permit because the TEMP Boiler has been removed from the facility.
- (b) To document compliance with Condition D.3.42 **10**, the Permittee shall maintain records of visible emission notations of ~~the Temp boiler stack exhaust and the~~ **Boiler #9 stack exhaust** once per **daylight** shift when combusting fuel oil.

Comment 30:

In the Natural Gas-fired Boiler Certification, The statement at the bottom of the form should be corrected to provide that a certification by the responsible official is not required for this report. This report contains an integral certification.

Response to Comment 30:

The natural gas-fired boiler certification does require the certification by the responsible official, therefore, this change will not be incorporated into the final Part 70 permit.

Comment 31:

Pfizer notified VCAPC on January 13, 2004 that the TEMP boiler had been disconnected and was no longer in service at their facility.

Response to Comment 31:

All references to the TEMP boiler have been removed.

Comment 32:

Pfizer supports the inclusion of this affirmative defense provision in the draft permit. There are three minor editorial comments that Pfizer offers regarding Condition C.11(c):

- (i) In paragraph (c)(1), an extraneous "a" should be deleted from the third line between "the" and "malfunction."
- (ii) Paragraph (c)(4) could be more simply worded in the following manner:

"The Permittee shall include each malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity lasting one (1) day or more in the Quarterly Deviation and Compliance Monitoring Report and must include the following:"

And

Pfizer supports the inclusion of this affirmative defense provision in the draft permit. There are three minor editorial comments that Pfizer offers in regard to this provision (Condition C.12(e)):

- (iii) In the opening paragraph of subcondition (e), a phrase appears to be omitted, based on a comparison of this provision and Condition C.11. Thus, in the third line of the opening paragraph, the phrase "or the compliance monitoring requirements included in Section D of this permit" should be inserted immediately after "326 IAC 3-5".
- (iii) In paragraph (e)(1), an extraneous "a" should be deleted from the third line between "the" and "malfunction."
- (iv) Paragraph (e)(4) could be more simply worded in the following manner:

"The Permittee shall include each malfunction, out of control period, calibration and adjustment activity, repair or maintenance activity lasting one (1) day or more in the Quarterly Deviation and Compliance Monitoring Report and must include the following:"

- (vi) The last two subconditions should be renumbered as (d) and (e).

Response to Comment 32:

IDEM and VCAPC feel the latest COM language is more appropriate. Therefore the new COM language will be incorporated into the Title V permit. See the responses to comments 10 and 11 above for the new language.

Technical Support Document:

Comment 33:

As a general matter, comments made by Pfizer with respect to terms and conditions of the draft Title V permit, as set forth above, are intended to apply as well to the draft Technical Support Document (TSD) to the extent that the TSD contains a discussion or summary of the permit terms and conditions which are the subject of Pfizer's comments.

Response to Comment 33:

The OAQ and VCAPC prefer 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 34:

The list of insignificant activities on pages 2-3 of the TSD is incomplete. It erroneously omits item (qq) from the draft permit, which identifies the Miscellaneous HCl emissions. In addition, item (pp) contains the same potentially confusing and reference to plant operations with HCl handling or storage operations which appears to be redundant with item (qq).

Response to Comment 34:

The OAQ and VCAPC prefer 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. However, OAQ and VCAPC is in agreement with this suggestion and the change has been made in the final Part 70 permit.

Comment 35:

The discussion of PTE on page 4 of the TSD contains obsolete and now erroneous information. The error consists of the statement that Pfizer's PTE for hydrogen chloride is greater than 10 tpy, which it is not. Based on the significant source modification SSM 167-15658, issued on 10-17-02, Pfizer's PTE for HCL is now limited to less than 10 tpy, by virtue of limitations taken on chlorine content of coal combusted in Boiler #8. This error should be corrected to avoid confusion and misunderstandings of Pfizer's current status as a minor source of HAPs.

Response to Comment 35:

OAQ and VCAPC feels that this language is needed to explain why a limit was needed for HCL. This shows that they would be considered a Major Source for HAP's without the limit. The OAQ and VCAPC prefer 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 36:

Regarding the **Federal Rule Applicability**, there is a minor error in paragraph (c)(3) where the reference to 40 CFR 60.42(c)(d) should be corrected to 40 CFR 60.42c(d).

Response to Comment 36:

The OAQ and VCAPC prefer 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 37:

Regarding the **State Rule Applicability – Entire Source**, in the last line of the discussion of Boiler #8, the word “defect” appears to be an error. It may be that “reflect” was intended. Pfizer respectfully suggests that “implement” may be a better word choice.

Response to Comment 37:

The OAQ and VCAPC prefer 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.

Upon further review, the OAQ and VCAPC have made the following changes:

The TEMP boiler has been removed from the source, therefore, A.2(f) has been removed (g has been relettered as f).

~~70,000 pound of steam per hour boiler manufactured by Volcano Technologies, identified as TEMP, with a maximum heat input capacity of 95.5 million (MM) Btu per hour when burning natural gas and 91.2 million (MM) Btu per hour when burning #2 fuel oil, utilizing low-NOx burners for control and exhausting through stack 5. The TEMP boiler was constructed in 2000.~~

Corrections have been made to Condition C.7 (Stack Height) in order to correctly state which provisions are not federally enforceable.

(1) C.7 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(d), (e), and (f), and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

Correction have been made to Conditions C.9 (Performance Testing), C.16 (Risk Management Plan), and C.21 (General Reporting Requirements) for consistency throughout the permit.

(2) C.9 Performance Testing [326 IAC 3-6]

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

(3) C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

(1) C.19 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) The Permittee shall submit an ~~annual~~ emission statement certified pursuant to the requirements of 326 IAC 2-6, ~~that must be received by July 1 of each year and~~ **This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the**

period identified in 326 IAC 2-6. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (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 purposes of Part 70 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

And

**Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807**

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

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807~~

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

~~(e b) The annual 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 and VCAPC, on or before the date it is due.~~

~~(4 5) C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]~~

~~(a) The source 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).~~

The following addition was incorporated for completeness reasons.

~~(5 6) D.4.4 Fuel Use Limitation [326 IAC 2-7-10.5(d)(5)(D)][40 CFR Part 63, Subpart GGG]~~

The following was not necessary, therefore it was removed from the condition.

(6 7) D.4.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Due to the size and potential to emit (PTE), and~~ During the period between 30 and 36 months after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.4.2, the Permittee shall perform PM testing for Boiler #8 utilizing methods as approved by the Commissioner.

The following opacity change was incorporated because Pfizer is required pursuant to 326 IAC 3-5 to operate continuous opacity monitors (COM) to measure opacity from the boiler. Pursuant to 326 IAC 5-1, the boiler is subject to a 40% opacity limit. Pursuant to 326 IAC 2-2, the boilers are also subject to particulate matter emission rates. The particulate matter emission limits and the opacity limits were established completely independently of one another. Therefore, compliance with a 40% opacity limit does not indicate compliance with the applicable particulate matter emissions limit.

During normal operations opacity from the boiler is significantly less than twenty percent. Therefore, it is appropriate for Pfizer to take response steps when the observed opacity is above the 20% level.

(7 8) D.4.17 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) In the event of opacity exceeding ~~thirty~~ **Twenty** percent (~~30~~ **20**%) average opacity, **or most recent stack test value**, for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below ~~thirty~~ **twenty** percent. Examples of expected response steps include, but are not limited to, boiler loads being reduced, ~~adjustment of flue gas conditioning rate, and ESP T-R sets~~ **and baghouse compartments** being returned to service.
- (b) Opacity readings in excess of ~~thirty~~ **twenty** percent (~~30~~ **20**%) but not exceeding the opacity limit for the unit are 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 violation of this permit.

The following changes were incorporated for clarifications purposes.

D.4.19 Record Keeping Requirements

- (i) To document compliance with Section C - Opacity and Conditions D.4.2 **and D.4.18**, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.4.2 **and D.4.18**.
- (1) Data and results from the most recent stack test;
 - (2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5;
 - (3) The results of all visible emission (VE) notations and Method 9 visible emission readings taken during any periods of COM downtime; and
 - (4) All baghouse parametric monitoring readings.
- (9) In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

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

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.

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) names 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Vigo County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

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

The Permittee owns and operates a stationary batch pharmaceutical manufacturing operation facility.

Responsible Official:	Plant Manager
Source Address:	100 Pfizer Drive, Terre Haute, Indiana 47802
Mailing Address:	PO Box 88, Terre Haute, Indiana 47808
General Source Phone Number:	(812)299-2121
SIC Code:	2833
County Location:	Vigo
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source for Nonattainment NSR

The state has initiated a rulemaking to adopt the federal 8-hour ozone nonattainment designation into 326 IAC 1-4. The applicability of the state nonattainment NSR program, 326 IAC 2-3 (Emission Offset), relies on the attainment designations in 326 IAC 1-4. Until the state rule has been updated, IDEM and VCAPC will rely on 326 IAC 2-1.1-5(a)(1) to apply minor limits to remain below the nonattainment NSR thresholds. 326 IAC 2-1.1-5(a)(1) clarifies that IDEM and VCAPC can not issue a permit or modification that will cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS). Vigo County has been designated as nonattainment for the 8-hour ozone standard. The existing approvals were correctly reviewed with regard to the Prevention of Significant Deterioration (PSD) program, and therefore will not be changed. However, any new applications will be reviewed under the new criteria.

Pfizer Inc.
100 Pfizer Dr., Terre Haute, Indiana 47802
167-7586-00013
Reviewer: Darren Woodward - VCAPC
Date: January 15, 2003

Natural Gas Combustion Only
MM BTU/HR <100
Unit ID: Boilers B-1 and B-2 (14.625 million BTU per hour each)

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

29.25

256.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	10.0	10.0	1.0	71.0 **see belo	16.0	150.0
Potential Emission in tons/yr	1.28	1.28	0.128	9.10	2.05	19.2

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from the boiler manufacturer (as converted by Pfizer)

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

Pfizer Inc.
100 Pfizer Dr., Terre Haute, Indiana 47802
167-7586-00013
Reviewer: Darren Woodward - VCAPC
Date: January 15, 2003

Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Unit ID: Boilers B-1 and B-2 (14.625 million BTU per hour each)

Heat Input Capacity
MMBtu/hr

Potential Throughput S = Weight % Sulfur
kgals/year

29.25

1830.21

0.5

Pfizer Inc.
100 Pfizer Dr., Terre Haute, Indiana 47802
167-7586-00013
Reviewer: Darren Woodward - VCAPC
Date: January 15, 2003

Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Unit ID: Boilers B-1 and B-2 (14.625 million BTU per hour each)

Heat Input Capacity
 MMBtu/hr

Potential Throughput $S = \text{Weight \% Sulfur}$
 kgals/year

0.5

29.25

1830.21

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	3.3	3.3	70.6	34.3	3.40	9.6
Potential Emission in tons/yr	3.02	3.02	64.6	31.4	3.11	8.79

Methodology

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

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from the boiler manufacturer (as converted by Pfizer)

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

**Appendix A: Emission Calculations
LPG - Propane - Industrial Boilers**

Boiler #8
Company Name: Pfizer, Inc.
Address: P.O. Box 88, Terre Haute, Indiana 47808
TV: 167-7586
Plt ID: 167-00013
Reviewer: Darren Woodward
Date: January 15, 2003

Heat Input Capacity Potential Throughput SO2 Emission factor = 0.10 x S
MMBtu/hr kgals/year S = Sulfur content = 0.02 grains/100ft³

40.00 3829.51

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2 (0.10S)	NOx	VOC **TOC val	CO
Potential Emission in tons/yr	1.15	1.15	0.004	36.4	0.957	6.13

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an e
(Source - AP-42 (Supplement B 10/96) page 1.5-1)
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 10
Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Appendix A: Emissions Calculations
Coal Combustion: Chain grate stokers

Boiler # 8
Company Name: Pfizer, Inc.
Address: P.O. Box 88, Terre Haute, Indi
TV: 167-7586
Plant ID: 167-00013
Reviewer: Darren Woodward
Date: January 15, 2003

Heat Input Capacity MMBtu/hr	Heat Content of Coal Btu/lb of Coal	Potential Throughput tons/year	Weight % Sulfur in Fuel
150	11,210	58,608	S = 2.2 %

Emission Factor in lb/ton	Pollutant					
	PM*	PM10*	SO2 (38S)	NOx	VOC	CO
Potential Emission in tons/yr	16.0	6.04	83.6	7.5	0.05	6.00
With PM <input type="text" value="99.00%"/> efficiency	4.70	1.77	2450	220	1.47	176
Potential Emission in lbs/MMBtu	0.715	3.73				
With PM <input type="text" value="99.00%"/> efficiency	0.007	0.037				

Methodology

*The PM emission factor is filterable PM only. The PM10 emission factor includes filterable and c

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 10⁶ Btu/MMBtu / Heat Con
 Emission Factors from AP-42, Chapter 1.1 for industrial overfeed stoker SCC 1-02-002-05/25 (Supplement E, 9/98)

Additional emission factors for commercial/institutional and electric generation boilers are availabl

Several HAPs emission factors are also available in AP-42, Chapter 1.1, depending on the type of boiler.

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

Emissions (lbs/MMBtu) = 10⁶ Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x Emission Factor (lb/ton)

**Appendix A: Emissions Calculations
Industrial Boilers (> 100 mmBtu/hr)
#1 and #2 Fuel Oil
Boiler #8**

Company Name: Pfizer, Inc.
Address: P.O. Box 88, Terre Haute, Indiana 47808
TV: 167-7586
Plt ID: 167-00013
Reviewer: Darren Woodward
Date: January 15, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.3
150	9385.714	

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10	SO2 (142.0S)	NOx	VOC	CO
Potential Emission in tons/yr	2.0	3.3	42.6	24.0	0.20	5.0
	9.39	15.5	200	113	0.939	23.5

Methodology

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

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x

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

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

emission factors to confirm that the correct factor is used (i.e., condensable included/not

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

**Appendix A: Emission Calculations
Industrial Boilers (> 100 mmBtu/hr)
#5 and #6 Fuel Oil
Boiler #8**

Company Name: Pfizer, Inc.
Address: P.O. Box 88, Terre Haute, Indiana 47808
TV: 167-7586
Plt ID: 167-00013
Reviewer: Darren Woodward
Date: January 15, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
150.00	9453.237	2

Emission Factor in lb/kgal	Pollutant					
	PM** 22 <i>*see below</i>	PM10 23.5	SO2 314 (157S)	NOx 47.0	VOC 0.28	CO 5.0
Potential Emission in tons/yr	102	111	1484	222	1.32	23.6

***Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal.**

***Particulate Matter emission factor for #6 fuel oil 9.19(s) + 3.22 lb/kgal.**

** PM emission factor is filterable PM only. Condensable PM emission factor is 1.5 lb/kgal.

Methodology

Normal Firing Emission Factors were used.

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

1 gallon of #6 Fuel oil has a heating value of 150,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x

Emission Factors are from AP42 Tables 1.3-1, 1.3-2 and 1.3-3 (SCC 1-01-004-01/02/03 and 1-01-004-05 and (AP-42 Supplement E 9/98)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR >100
Boiler #8**

Company Name: Pfizer, Inc.
Address: P.O. Box 88, Terre Haute, Indiana 47808
TV: 167-7586
Plt ID: 167-00013
Reviewer: Darren Woodward
Date: January 15, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
40.0	350.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	280.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.333	1.33	0.105	49.1	0.964	14.7

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

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burn (See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 above emission factors to confirm that the correct factor is used (i.e., condensable)

Pfizer Inc.
100 Pfizer Dr., Terre Haute, Indiana 47802
167-12343-00013
Reviewer: Darren Woodward - VCAPC
Date: January 15, 2003

Unit ID: Boilers B-1 and B-2 (14.625 million BTU per hour each)
Limited to 233,800 gallons per year each of #2 fuel oil

233,800 gallons of #2 fuel oil per year each for boilers B-1 and B-2, which is:
 467,600 gallons of #2 fuel oil per year each total, which has a heating value (assuming 140,000 BTU per gallon) of:
 65,464 million BTU per year from the fuel oil combustion
 256,230 million BTU per year total based on the Heat Input Capacity and 8760 hours per year, which leaves:
 190,766 million BTU per year from the natural gas combustion, which is equivalent to:
 190.8 million cubic feet of natural gas per year

Heat Input Capacity MMBtu/hr	Natural Gas Potential		#2 Fuel Oil Potential			
	Throughput in MMCF		Throughput in kgals/year			
29.25	190.8		467.60			
		Pollutant				
	PM*	PM10*	SO2	NOx	VOC	CO**
<i>Natural Gas Combustion</i>						
Emission Factor in lb/MMCF	10	10	1	71	16	150
Potential Emission in tons/yr	1.0	1.0	0.1	6.8	1.5	14.3
<i>#2 Fuel Oil Combustion</i>						
Emission Factor in lb/kgal	3.3	3.3	70.6	34.3	3.4	9.6
Potential Emission in tons/yr	0.8	0.8	16.5	8.0	0.8	2.2
<i>Total Potential Emission in tons/yr</i>	1.7	1.7	16.6	14.8	2.3	16.6
PSD Significant Level	25	15	40	40	40	100
Significant ?	N	N	N	N	N	N

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

**The emission rate for CO is higher for natural gas only, therefore it is being directly transferred in from before

Methodology

The same Methodology is being utilized as before with the exception of the amount of fuel being burned. That is being set at the daily limit for #2 fuel oil, with the rest of the year being on natural gas.