

VIA FEDERAL EXPRESS

Mr. John Walker  
Mead Johnson & Company  
2400 West Llyod Expressway  
Evansville, Indiana 47721-0001

Re: SMF129-9060  
Second Significant Modification with ENSR to  
FESOP 129-5036-00021

Dear Mr. Walker:

Mead Johnson & Company was issued a permit on December 11, 1996 and the first significant modification to the existing FESOP on October 2, 1997, for an excising pharmaceutical formulation and preparations operation located at State Highway 62 East, Mt. Vernon, Indiana. A letter requesting a modification to this existing source, was received on September 22, 1997. Pursuant to the provisions of 326 IAC 2-8-11, a significant modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following equipment added to the source:

- (5) Two (2) dry material mixing units designated as S-9 and S-10, controlled by a baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (6) Two (2) dry weighing units designated as 1107 and 1108, controlled by a baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (7) Four (4) core pressing units designated as 1106, 1109, 1111 and 1113, controlled by a baghouse designated as DC-2 and exhausts to a stack designated as SV-10.
- (8) One (1) core pressing unit designated as 1122, which exhausts to a stack designated as SV-9.
- (9) Two (2) core pressing units designated as 1120 and 1121, controlled by a baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (10) One (1) coating unit for dry tablets from facilities 1106, 1109, 1111 and 1113, designated as S-20, which utilizes two (2) coating pans, controlled by baghouses designated as DC-12001 and DC-12201 and exhausts to stacks designated as SV-11 and SV-12.
- (11) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-21 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-20601 and exhausts to a stack designated as SV-13.
- (12) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-22 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-20801 and exhausts to a stack designated as SV-14.
- (13) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-23 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-21001 and exhausts to a stack designated as SV-15.
- (14) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-24 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-8 and exhausts to a stack designated as SV-16.

- (15) One (1) coating unit for dry tablets from facilities 1120,1121 and 1122, designated as S-25 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-9 and exhausts to a stack designated as SV-17.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, of my staff, at 317-233-6875 or 1-800-451-6027 (ext 3-6875).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

NLJ

cc: File - Posey County  
U.S. EPA, Region V  
Posey County Health Department  
Air Compliance Section Inspector - Gene Kelso  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Nancy Landau

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for New Construction and Operation

Source Name: Mead Johnson & Company  
Source Location: State Highway 62 East, Mt. Vernon, IN.  
County: Posey  
Significant Modification No.: SMF-129-9060-00021  
SIC Code: 2834  
Permit Reviewer: Nysa L. James

On February 4, 1998, the Office of Air Management (OAM) had a notice published in the Mount Vernon Democrat, Mount Vernon, Indiana, stating that Mead Johnson & Company had applied for a construction permit to construct and operate a modification of the existing pharmaceutical formulation and preparations operation with control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 9, 1998, Mead Johnson & Company submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

- Comment 1: The suggested corrections, from Mead Johnson & Company, to the FESOP Significant Modification, is that the responsible official name be changed from John Walker to Thomas R. Ward on page 4 of 31, Section A..1.
- Response 1: The Office of Air Management (OAM) shall change Section A.1 on page 4 of 31 to the following (changes are bolded for emphasis):  
**Responsible Official: Thomas R. Ward.**
- Comment 2: The suggested corrections, from Mead Johnson & Company, to the FESOP Significant Modification, is that the first insignificant activity listed on page 4 of 31, Section A.3 be changed from "Two (2) 20,000 gallon above-ground storage tanks containing a No. 2 fuel oil" to "One (1) 20,000 gallon above-ground.
- Response 2: OAM has reviewed and verified that since the time the original FESOP 129-5036 was issued, the two (2) underground storage tanks, which originally was permitted as two (2) above-ground storage tanks containing No. 2 fuel, have been replaced with one (1) above-ground storage tank containing No. 2 fuel. The emissions from this change will not be affected. This facility is considered an insignificant activity. OAM shall change page 4a of 31, Section A..3, item (1), from "Two (2) 20,000 gallon above-ground storage tanks containing a No. 2 fuel oil" to the following (changes are bolded for emphasis):  
**"One (1) 20,000 gallon above-ground containing a No. 2 fuel oil".**
- Comment 3: A typographical error was noticed by Mead Johnson and Company. Page 26g of 31, Section D.5.11, read " An inspection shall be performed to each calendar quarter of all bags controlling the woodworking operation" and the company suggests it to read " An inspection shall be performed to each calendar quarter of all bags controlling the process operation".
- Response 3: OAM has reviewed and verified that page 26g, Section D.5.11 to be a typographical error

and will change from "woodworking operation" to the following (changes are bolded for emphasis): "**An inspection shall be performed to each calendar quarter of all bags controlling the process operation.**"

On February 13, 1998, the OAM determined that the following changes to the proposed construction permit are required to properly reflect the first significant FESOP modification SMF 129-8570, issued on October 2, 1997:

- (1) The OAM determined that page 16 of 31, Section B.27 is redundant. This section was originally modified in the first significant FESOP modification. Therefore, page 16 shall be removed from the final second significant FESOP modification.
- (2) The OAM determined that one (1) natural gas fired boiler, with the capability of firing No. 2 distillate oil as an alternative fuel source was inadvertently omitted from the proposed permit. The following changes are as follows:
  - (a) The table of contents, page 3 of 31, Section D will add the natural gas boiler to reflect the first significant FESOP modification as D.4 on page 26a.
  - (b) The new equipment originally listed under Section D.4 in the table of contents (page 3 of 31) will now be under Section D.5 and listed on pages 26e-h instead of 26a-d.
  - (c) The new equipment listed under Section D, Facility Conditions, shall be listed under D.5 instead of D.4 and located on pages 26e-h instead of 26a-d.
  - (d) Page 3 of 31, Section A.2 (Emission Units and Pollution Control Devices) shall be amended to reflect the natural gas fired boiler. The number of significant facilities shall change from 14 to 15.

Due to the above changes, the OAM determined that the total number of pages shall be changed from 30 to 31.

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP) and Enhanced New  
Source Review (ENSR)  
OFFICE OF AIR MANAGEMENT**

**Mead Johnson & Company  
State Highway 62 East  
Mt. Vernon , Indiana 47620**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F129-5036-00021	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 11, 1996
First Significant Permit Modification: SMF129-8570	
Issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 2, 1997
Second Significant Permit Modification: SMF129-9060	Pages Affected: 2, 3, 4, 4a, 17a, 18a, 19a, 21 and 26e-h
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

<b>TABLE OF CONTENTS</b>		
<b>Section</b>	<b>Description</b>	<b>Page No.</b>
	<b>COVER PAGE</b>	<b>1</b>
	<b>TABLE OF CONTENTS</b>	<b>2</b>
<b>A</b>	<b>SOURCE SUMMARY</b>	<b>4</b>
A.1	General Information [326 IAC 2-8-3(c)]	
A.2	Emission Units and Pollution Control Devices [326 IAC 2-8-3(c)]	
A.3	Insignificant Activities [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
<b>B</b>	<b>GENERAL CONDITIONS</b>	<b>5</b>
B.1	General Requirements [IC13-15] [IC 13-17]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement & Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]	
B.14	Emergency Provision [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation, Reissuance and Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-3(h)] [326 IAC 2-8-8(a)] [326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)]	
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]	
B.22	Operational Flexibility [326 IAC 2-8-15]	
B.23	Construction Permit Requirement [326 IAC 2-1]	
B.24	Inspection and Entry [326 IAC 2-8-5(a)(2)]	
B.25	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	
B.26	Affidavit	
B.27	Enhanced New Source Review	

<b>TABLE OF CONTENTS</b>		
<b>Section</b>	<b>Description</b>	<b>Page No.</b>
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b>	<b>17</b>
<b>D.1</b>	<b>FACILITY OPERATION CONDITIONS</b>	<b>22</b>
	Two (2) natural gas fired boilers (No. 2 fuel oil as alternative)	
<b>D.2</b>	<b>FACILITY OPERATION CONDITIONS</b>	<b>24</b>
	Two (2) diesel fueled generators	
<b>D.3</b>	<b>FACILITY OPERATION CONDITIONS</b>	<b>25</b>
	One (1) incinerator	
<b>D.4</b>	<b>FACILITY OPERATION CONDITIONS</b>	
	One (1) natural gas fired boiler (No. 2 fuel oil as alternative)	<b>26a</b>
<b>D.5</b>	<b>FACILITY OPERATION CONDITIONS</b>	<b>26e</b>
	Two (2) mixing units, Two (2) weighing units, Seven (7) core pressing units and five (5) coating units	
	<b>FORMS</b>	
	Certification Form	<b>27</b>
	Deviation Form	<b>28</b>
	Reporting Forms	<b>29,30,31</b>
	<b>Total Number of Permit Pages</b>	<b>31</b>
	<b>Total Number of Forms</b>	<b>6</b>
	<b>Technical Support Document</b>	<b>10</b>
	<b>Emissions Calculations</b>	<b>10</b>

## SECTION A SOURCE SUMMARY

### A.1 General Information [326 IAC 2-8-3(c)]

The Permittee owns and operates a pharmaceutical packaging and research and development company.

Responsible Official: Thomas R. Ward  
Source Address: State Highway 62 East, Mt. Vernon, Indiana, 47620  
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721  
SIC Code: 2834  
County Location: Posey County  
County Status: Attainment for all criteria pollutants  
Source Status: Synthetic Minor Source, Part 70 Permit Program

### A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]

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

- (1) Two (2) natural gas fired boilers, with the capability of using No. 2 fuel oil as an alternative fuel source. These boilers have a maximum capacity of 30.64 million Btu each and are identified as S-1 and S-2. They do not possess pollution control devices. They exhaust to stacks corresponding to the same identification, S-1 and S-2.
- (2) Two (2) diesel fuel generators. Generator S-3 has a heat output of 1300 kW, a heat input capacity of 4.4 million Btu per hour and has no air pollution control equipment. Generator S-7 has a heat output of 280 hp, a heat input of 0.7 million Btu per hour and has no air pollution control equipment. The generators exhaust to stacks corresponding to the same identification, S-3 and S-7.
- (3) One (1) natural gas incinerator, 1.5 million Btu, with a maximum capacity of 350 pounds per hour. This emissions unit is identified as S-4. This incinerator emits Hazardous Air Pollutants (HAPs). It does not possess air pollution control equipment. The incinerator exhausts to a stack identified as S-4.
- (4) One (1) natural gas fired boiler, with the capability of firing No. 2 distillate oil as an alternative fuel source. The boiler is identified as emission unit S-8 and it has a maximum heat input rate of 31.5 mmBtu/hr The boiler does not possess a pollution control device, and it exhausts to one (1) stack identified as S-8.
- (5) Two (2) dry material mixing units designated as S-9 and S-10, controlled by a Baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (6) Two (2) dry weighing units designated as 1107 and 1108, controlled by a Baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (7) Four (4) core pressing units designated as 1106, 1109, 1111 and 1113, controlled by a Baghouse designated as DC-2 and exhausts to a stack designated as SV-10.
- (8) One (1) core pressing unit designated as 1122, which exhausts to a stack designated as SV-9.
- (9) Two (2) core pressing units designated as 1120 and 1121, controlled by a Baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (10) One (1) coating unit for dry tablets from facilities 1106, 1109, 1111 and 1113, designated as S-20, which utilizes two (2) coating pans, controlled by Baghouses designated as DC-12001 and DC-12201 and exhausts to stacks designated as SV-11 and SV-12.

- (11) One (1) coating unit for dry tablets from facilities 1120,1121 and 1122, designated as S-21 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-20601 and exhausts to a stack designated as SV-13.
- (12) One (1) coating unit for dry tablets from facilities 1120,1121 and 1122, designated as S-22 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-20801 and exhausts to a stack designated as SV-14.
- (13) One (1) coating unit for dry tablets from facilities 1120,1121 and 1122, designated as S-23 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-21001 and exhausts to a stack designated as SV-15.
- (14) One (1) coating unit for dry tablets from facilities 1120,1121 and 1122, designated as S-24 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-8 and exhausts to a stack designated as SV-16.
- (15) One (1) coating unit for dry tablets from facilities 1120,1121 and 1122, designated as S-25 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-9 and exhausts to a stack designated as SV-17.

A.3 Insignificant Activities [326 IAC 2-8-3(c)(3)(I)]

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

- (1) One (1) 20,000 gallon underground storage tank containing No. 2 fuel oil.
- (2) One (1) 1,130 gallon aboveground storage tank containing gasoline.
- (3) One (1) 1,130 gallon aboveground storage tank containing diesel fuel.
- (4) One (1) 300 gallon aboveground storage tank containing diesel fuel.
- (5) One (1) 250 gallon aboveground storage tank containing diesel fuel.
- (6) Cold solvent cleaning station (2 square feet)
- (7) Cold solvent cleaning station (3.75 square feet)
- (8) Light vehicle traffic on paved roads
- (9) Power mixing cabinets
- (10) Pharmaceutical packaging lines with rotoclone
- (11) Research and development operations
- (12) Natural gas fired boiler - 150 hp (exemption received but never placed into operation)

These insignificant activities do not generate nitrogen oxide (NOx) or hazardous air pollutant emissions (HAPs) and therefore, are not included in the nitrogen oxide and hazardous air pollutant emission limits established in this permit.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.5.1 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

### Testing Requirements [326 IAC 2-8-4(3)]

#### C.5.2 Performance Testing [326 IAC 3-2.1]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

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

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

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.7.1 Pressure Gauge Specifications**

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.

### **C.7.2 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACE) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall insure 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
  - (3) 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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACE 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) 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 that the inspector be accredited is federally enforceable.

## **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.8.1 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RAMP); and
  - (3) A verification to IDEM, OAM that a RAMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.8.2 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.
- (e) The first report shall cover the period commencing the date of issuance of this permit and ending March 31, 1997.

## **Stratospheric Ozone Protection**

### **C.12 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.5

## FACILITY CONDITIONS

- 5.) Two (2) dry material mixing units designated as S-9 and S-10, controlled by a Baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- 6.) Two (2) dry weighing units designated as 1107 and 1108, controlled by a Baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- 7.) Four (4) core pressing units designated as 1106, 1109, 1111 and 1113, controlled by a Baghouse designated as DC-2 and exhausts to a stack designated as SV-10.
- 8.) One (1) core pressing unit designated as 1122, which exhausts to a stack designated as SV-9.
- 9.) Two (2) core pressing units designated as 1120 and 1121, controlled by a Baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- 10.) One (1) coating unit for dry tablets from facilities 1106, 1109, 1111 and 1113, designated as S-20, which utilizes two (2) coating pans, controlled by Baghouses designated as DC-12001 and DC-12201 and exhausts to stacks designated as SV-11 and SV-12.
- 11.) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-21 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-20601 and exhausts to a stack designated as SV-13.
- 12.) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-22 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-20801 and exhausts to a stack designated as SV-14.
- 13.) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-23 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-21001 and exhausts to a stack designated as SV-15.
- 14.) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-24 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-8 and exhausts to a stack designated as SV-16.
- 15.) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-25 which utilizes one (1) coating pan, controlled by a Baghouse designated as DC-9 and exhausts to a stack designated as SV-17.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **Construction Conditions [326 IAC 2-1-3.2]**

#### **General Construction Conditions**

D.5.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### **Effective Date of the Permit**

D.5.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.5.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the

approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

- D.5.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

#### **First Time Operation Permit**

- D.5.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration & Development Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

#### **Operation Conditions**

#### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

##### **D.5.6 Particulate Matter (PM) [326 IAC 6-3]**

---

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the mixing, weighing, pressing and coating facilities shall not exceed 7.21 pounds per hour when operating at a process weight rate of 4648 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- D.5.7 Preventive Maintenance Plan [326 IAC 2-8-3(c)(6)]

---

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

### **Compliance Determination Requirements**

#### **D.5.8 Testing Requirements [326 IAC 2-8-5(1)]**

---

- (a) Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.4.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

### **Compliance Monitoring Requirements**

#### **D.5.9 Particulate Matter (PM)**

---

The Baghouses for PM control shall be in operation at all times when the mixing, weighing, pressing and coating facilities are in operation and exhausting to the outside atmosphere.

#### **D.5.10 Visible Emissions Notations**

---

- (a) Daily visible emission notations of the mixing, weighing, pressing and coating facilities stack exhaust shall be performed during normal daylight operations. 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.

#### **D.5.11 Baghouse Inspections**

---

An inspection shall be performed each calendar quarter of all bags controlling the process operations. All defective bags shall be replaced.

#### **D.5.12 Broken Bag or Failure Detection**

---

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.5.13 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.5.11, the Permittee shall maintain records of the results of the inspections required under Condition D.5.11 (nine (9) Baghouses).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the FESOP permit.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for New Construction and Operation and FESOP Significant Modification

#### Source Background and Description

Source Name: Mead Johnson & Company  
Source Location: State Highway 62 East, Mt. Vernon, IN.  
County: Posey  
Significant Modification No.: SMF-129-9060-00021  
SIC Code: 2834  
Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Mead Johnson & Company relating to the modification of the existing pharmaceutical formulation and preparations operation. The source has been issued the first significant FESOP modification on October 2, 1997. This second significant FESOP modification shall incorporate all changes issued since the original FESOP was issued on December 11, 1996. The source consists of the installation and operation of the following equipment:

#### Entire Source:

##### Permitted Emission Units and Pollution Control Equipment

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

- (1) Two (2) natural gas fired boilers, with the capacity of using No. 2 fuel oil as an alternative fuel source. These boilers have a maximum capacity of 30.64 mmBtu/hr each and are identified as S-1 and S-2. They do not possess pollution control equipment and they exhaust to stacks corresponding to the same identification, S-1 and S-2.
- (2) Two (2) diesel fuel generators. Generator S-3 has a heat output of 1300 kW, a heat input capacity of 4.4 mmBtu/hr and has no pollution control equipment. Generator S-7 has a heat output of 280 hp, a heat input of 0.7 mmBtu/hr and has no air pollution control equipment. The generators exhaust to stacks corresponding to the same identification, S-3 and S-7.
- (3) One (1) natural gas incinerator, 1 mmBtu/hr, with a maximum capacity of 250 pounds per hour. This emission unit is identified as S-4. This incinerator emits HAPs and it does not possess any air pollution control equipment. This incinerator exhausts to a stack identified as S-4.

##### Insignificant Activities

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

- (1) Two (2) 20,000 gallon underground storage tanks containing No. 2 fuel oil.
- (2) One (1) 1,130 gallon aboveground storage tank containing gasoline.
- (3) One (1) 1,130 gallon aboveground storage tank containing diesel fuel.
- (4) One (1) 300 gallon aboveground storage tank containing diesel fuel.
- (5) One (1) 250 gallon aboveground storage tank containing diesel fuel.

- (6) Cold solvent cleaning station (2 square feet).
- (7) Cold solvent cleaning station (3.75 square feet).
- (8) Light vehicle traffic on paved roads.
- (9) Powder mixing cabinets.
- (10) Pharmaceutical packaging lines with rotoclone.
- (11) Research and Development operations.
- (12) Natural gas fired boiler

These emission units are permitted under FESOP F-129-5036-00021, issued on December 11, 1996.

**New Emission Units and Pollution Control Equipment Requiring ENSR**

The application includes information relating to the construction and operation of the following equipment:

- (1) Two (2) dry material mixing units designated as S-9 and S-10, controlled by a baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (2) Two (2) dry weighing units designated as 1107 and 1108, controlled by a baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (3) Four (4) core pressing units designated as 1106, 1109, 1111 and 1113, controlled by a baghouse designated as DC-2 and exhausts to a stack designated as SV-10.
- (4) One (1) core pressing unit designated as 1122, which exhausts to a stack designated as SV-9.
- (5) Two (2) core pressing units designated as 1120 and 1121, controlled by a baghouse designated as DC-1 which exhausts to a stack designated as SV-9.
- (6) One (1) coating unit for dry tablets from facilities 1106, 1109, 1111 and 1113, designated as S-20, which utilizes two (2) coating pans, controlled by baghouses designated as DC-12001 and DC-12201 and exhausts to stacks designated as SV-11 and SV-12.
- (7) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-21 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-20601 and exhausts to a stack designated as SV-13.
- (8) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-22 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-20801 and exhausts to a stack designated as SV-14.
- (9) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-23 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-21001 and exhausts to a stack designated as SV-15.
- (10) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-24 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-8 and exhausts to a stack designated as SV-16.
- (11) One (1) coating unit for dry tablets from facilities 1120, 1121 and 1122, designated as S-25 which utilizes one (1) coating pan, controlled by a baghouse designated as DC-9 and exhausts to a stack designated as SV-17.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
----------	-----------	---------------	-----------------	------------------	------------------

SV-9	mixing, weighing and press units	to be determined	to be determined	24,500	70
SV-10	press units	to be determined	to be determined	3,200	70
SV-11	coating units	to be determined	to be determined	4,500	70
SV-12	coating units	to be determined	to be determined	4,500	70
SV-13	coating units	to be determined	to be determined	4,500	70
SV-14	coating units	to be determined	to be determined	4,500	70
SV-15	coating units	to be determined	to be determined	4,500	70
SV-16	coating units	to be determined	to be determined	4,500	70
SV-17	coating units	to be determined	to be determined	4,500	70

**Recommendation**

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

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

An application for the purposes of this review was received on September 22, 1997, with additional information received on January 8, 1998..

**Emissions Calculations**

Emission Calculations, for the new emission units being reviewed under ENSR, were submitted by the source and OAM has verified such calculations to be correct.

**Total Potential and Allowable Emissions**

The following total potential emissions are for the new emission units only, being reviewed under ENSR.

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	31.60	117.03
Particulate Matter (PM10)	31.60	117.03

Sulfur Dioxide (SO <sub>2</sub> )	--	--
Volatile Organic Compounds (VOC)	--	--
Carbon Monoxide (CO)	--	--
Nitrogen Oxides (NO <sub>x</sub> )	--	--
Single Hazardous Air Pollutant (HAP)	--	--
Combination of HAPs	--	--

(a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3-2.

(i) 326 IAC 6-3 (Process Operations):

The mixing, weighing, pressing and coating units shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67}; \quad \text{where } P = \text{process weight in tons per hour}$$

$$P = 4648 \text{ lbs/hr} \cdot 1\text{ton}/2000 \text{ lbs} = 2.324 \text{ tons/hr}$$

$$E = \text{rate of emission in pounds per hour}$$

Therefore;  $E = 4.10 \cdot 2.324^{0.67} = 7.21 \text{ lbs/hr} \cdot 24 \text{ hr}/1\text{day} = 173.13 \text{ lbs/day}$   
 $E = 2.324 \text{ lbs/hr} \cdot 8760 \text{ hr}/2000 \text{ lbs} = 31.60 \text{ tons/yr.}$

The source is in compliance with 326 IAC 6-3-2 because of the control equipment utilized.

- (b) The allowable emissions based on the rules cited are less than the potential emissions, therefore, the allowable emissions are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of PM are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

**County Attainment Status**

- (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. Posey 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) Posey County has been classified as attainment or unclassifiable for PM, CO, SO<sub>2</sub> and NO<sub>x</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

**Source Status**

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

Pollutant	Emissions (ton/yr)
-----------	-----------------------

PM	11.5
PM10	11.5
SO <sub>2</sub>	90.4
VOC	6.1
CO	35.8
NO <sub>x</sub>	98.9

- (a) This existing source is not a major source because the source has been issued a FESOP on December 11, 1996 with a limit of 99 tons per year.
- (b) These emissions were based on the FESOP (F129-5036-00021) issued to the source on December 11, 1996 and the First Significant FESOP Modification issued on October 2, 1997.

**Proposed Modification**

Since the PM emissions are greater than 25 tons per year for the new construction, this construction will constitute as a significant modification to the existing FESOP.

This proposed permit will satisfy the construction permit requirements.

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)	Single HAP (ton/yr)	Combo HAPs (ton/yr)
Proposed Modification(ENSR)	5.85	5.85	0.00	0.00	0.00	0.00	0.00	0.00
Existing FESOP Limits F-129-5036-000021, issued on December 11, 1996 and the First Significant FESOP Modification issued on October 2, 1997	11.5	11.5	90.2	6.1	35.8	98.9	9.0	9.1
Revised FESOP Limits for the entire Source	17.35	17.35	90.2	6.1	35.8	98.9	9.0	9.1
Title V Significant Levels	99	99	99	99	99	99	9	24

Note: This source will be able to keep its FESOP status.

This modification to this FESOP stationary source will not change the status of the stationary source because the emissions increase is still less than the FESOP significant levels.

Therefore, the following requirements will not apply:

- (a) PSD, 326 IAC 2-2, and 40 CFR 52.21,
- (b) Emission Offset, 326 IAC 2-3, and
- (c) Part 70 Permit Program, 326 IAC 2-7.

### **Part 70 Permit Determination**

326 IAC 2-8 (FESOP) and 326 IAC 2-7 (Part 70 Permit Program)

This existing source has been issued a FESOP (F-129-5036-00021) on December 11, 1996. The source shall be able to maintain the FESOP status.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards 40 CFR Part 60 applicable to these new facilities.
- (b) There are no NESHAP 40 CFR Part 63 applicable to these new facilities.

### **State Rule Applicability**

326 IAC 2-2 (PSD) does not apply to the new facilities because the PM emissions are less than 100 tons/yr.

326 IAC 5-1-2 (Opacity Limitations):

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2(c) (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) The baghouses for particulate matter control shall be in operation at all times when the mixing, pressing, weighing and coating units are in operation.
- (b) The mixing, pressing, weighing and coating units shall comply with 326 IAC 6-3-2(c) using the following equation:  
$$E = 4.10P^{0.67}$$
 where: E = rate of emission in pounds per hour,  
P = process weight in tons per hour
- (c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the baghouses.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

- (e) The Permittee shall take readings of the total static pressure drop across the baghouses, at least (specify schedule such as once per week). Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1 and 4 inches of water. The Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.
- (f) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (g) The gauge employed to take the pressure drop across the baghouses or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within  $\pm 2\%$  of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- (h) An inspection shall be performed each calendar quarter of all the baghouses. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.
- (i) In the event that a bag's failure has been observed:
  - (i) The affected compartments will be shut down immediately until the failed units have been replaced.
  - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (j) That visible emission notations of all exhaust to the atmosphere from the baghouses shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.
  1. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
  2. In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
  3. 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 and abnormal visible emissions for that specific process.
  4. The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

The source is in compliance with 326 IAC 6-3-2 because of the baghouses utilized for control purposes.

326 IAC 1-6-3 (Preventive Maintenance):

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM.

No 326 IAC 8 rules apply because there are no VOC emissions.

**Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) None of these listed air toxics will be emitted from this proposed construction.
- (b) 326 IAC 2-1-3.4 will not apply because there are no HAP emissions.

**FESOP Changes**

Due to the installation of these emission units, the following sections, pages and items of the original FESOP shall be revised:

- (a) Section A.2.1, Emission Units and Pollution Control Devices on page 4 to 4a of 31 (incorporates new emission units).
- (b) Section B.27, Enhanced New Source Review on page 16 of 31 (construction dates for the new emission units only).
- (c) Section C.5.1, Asbestos Abatement Projects, on page 17a of 31 (new rule mandatory now for all FESOPs).
- (d) Section C.7.1, Pressure Gauge Specifications on page 18a of 31 (specific conditions for the new baghouse emission units).
- (e) Section C.7.2, Asbestos Abatement Projects on page 18a of 31 (new rule mandatory now for all FESOPs).
- (f) Section C.8.1, Risk Management Plan on page 19a of 31 (new rule mandatory now for all FESOPs).

- (g) Section C.8.2, Actions Related to Noncompliance Demonstrated by a Stack Test on page 19a of 31 (new rule mandatory now for all FESOPs).
- (h) Section C.12, Stratospheric Ozone Protection on page 21 of 31 (new rule mandatory now for all FESOPs).
- (i) Section D.4, Facility Conditions on pages 26a-d(specific conditions for the new emission units).

## **Conclusion**

The construction of this modification will be subject to the conditions of the attached proposed **FESOP Significant Modification Permit No. SMF-129-9060-00021**.