

COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR

**TITLE V FINAL OPERATING PERMIT
AIR QUALITY AREA
ENVIRONMENTAL QUALITY BOARD**



Permit Number:	PFE- TV-2834-16-1196-0019
Permit Application Received:	November 27, 1996
Issue and/or Effectiveness Date:	May 16, 2005
Expiration Date:	May 16, 2010 ¹

In accordance with the provisions of Part VI of the Regulation for the Control of Atmospheric Pollution (RCAP) and the Code of Federal Regulations, Title 40, Part 70

**LILLY DEL CARIBE, INC.
CAROLINA, PUERTO RICO**

hereinafter referred to as **Lilly** or **the permittee**, is authorized to operate a stationary source of air pollutants limited to the emission units and conditions described in this permit. Until such time as this permit expires, is modified or revoked, Lilly is allowed to discharge air pollutants from those processes and activities directly related to or associated with air pollutant sources in accordance with the requirements, limitations and conditions of this permit.

The conditions in this permit are federally and state enforceable. Requirements, which are only state enforceable are identified as such in the permit. A copy of this permit shall be kept on-site at the above-mentioned facility at all times.

¹ The underline conditions were revised or added by a reconsideration process. The effective date of these conditions will be April 28, 2006.

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Section I – General Information

A. Facility Information

Company Name: **Lilly del Caribe, Inc.**

Postal Address: **PO Box 1198**

City: **Carolina** State: **PR** Zip Code : **00986-1198**

Name of the Facility: **Lilly del Caribe, Inc.**

Location of Facility: **PR 3, Km 12.6, Carolina, Puerto Rico**

Postal Address of the Facility: **PO Box 1198, Carolina, PR 00986-1198**

Responsible Official: **Mrs. Maria A. Crowe, President and General Manager**

Telephone: **(787) 257-5700**

Technical Contact Person: **Miss Aileen Ocasio, Health Official,
Occupational Safety and Environmental Issues**

Telephone: **(787) 257-5386** Fax: **(787) 257-5933**

SIC Primary Code: **2834**

B. Process Description

Lilly del Caribe Inc. is an industry engaged in the intermediate bulk and final manufacture of pharmaceutical products. Currently Lilly manufactures only human care products in its three plants PR01, PR02 y PR05 jointly located.

For the manufacture of these products Lilly uses a series of processes that result in atmospheric emissions, including: dispensing, mixing, drying and weighing of material, compression, finishing and imprinting of tablets; filling capsules; fermentation, purification, evaporation, crystallization and vacuum drying processes. In addition solvent recovery columns are used to support the manufacturing processes.

Lilly uses as indirect manufacturing equipment boilers to provide steam to the facility, emergency electric generators and storage tanks for chemical products, fuels and waste generated during the pharmaceutical production process.

To control atmospheric discharges from emission points, Lilly uses equipment such as: gas scrubbers, condensers, carbon absorbers, dust collectors and filters. The control equipment is described in Attachment I of this permit.

The emission units are defined in Section II to this permit and the insignificant emission units are defined in Section VIII. Lilly is considered a major source of emissions since it has the potential to discharge more than 100 tons/yr of each of the following criteria pollutants: particulate matter (PM₁₀), sulfur dioxide (SO₂) and nitrogen oxides (NO_x).

Section II – Description of the Emission Units

The emission units regulated by this permit, at the time of issue are as follows:

Emission Unit	Description
EU – HFOBOILER-1	Two boilers with a heating capacity of 12.6 MMBtu/hr each, both use liquid fuel with maximum sulfur content of 2.5% by weight.
EU – HFOBOILER-2	One boiler with heating capacity of 12.6 MMBtu/hr using liquid fuel with maximum sulfur content of 1.5% by weight.
EU – LFOBOILER	Two boilers with 25.8 y 46.9 MMBtu/hr heating capacity respectively, both use liquid fuel with maximum sulfur content of 0.5% by weight.
EU – GT500EMGEN-4	Emergency generators each capable of generating less than 3,500 hp and meant to operate more than 500 hr/yr. They burn diesel fuel with maximum sulfur content of 0.05% by weight.
EU – GT500EMGEN-2	One emergency generator capable of generating 1.6 MW and meant to operate more than 500 hr/yr. They burn diesel fuel with maximum sulfur content of 0.5% by weight.
EU – NSPSBOILERS	Two boilers with heat input less than 100 MMBtu/hr each, capable of producing no more than 55,000 lb/hr of steam. They burn kerosene fuel with maximum sulfur content of 0.2% by weight.
EU – GT500EMGEN-3	Three emergency generators and one emergency pump in case of fire capable or operating more than 500 hr/yr each. They burn diesel fuel with maximum sulfur content of 0.05% by weight.
EU – AMMONIAUNITS	This unit includes processes that release ammonia such as: resin regeneration, product elution, and product concentration. The ammonia recovery processes and the ammonia storage tanks with capacity of more than 10,000 gallons are also included in this unit.

Emission Unit	Description
EU – DUSTUNITS	This unit includes non-process sources that release particulate matter. They include pharmaceutical manufacturing processes such as: dispatching of raw material, drying, granulation, mixing, coating and filling of capsules and tablet compression, among others.
EU – VOCUNITS-1	This unit includes processes that release more than 3 lbs/hr and 15 lbs/day of VOC and are connected to control equipment such as: product concentration, drying and solvent recovery, among others.
EU – VOCUNITS-2	This unit includes processes that release less than 3 lbs/hr and 15 lbs/day of VOC and are not connected to any control equipment such as: imprinting of tablets, resin regeneration, product elution, crystallization, drying, evaporation, solution preparation and equipment cleaning, among others.
EU – TANKS	This unit consists of storage tanks for volatile organic liquids with capacity of less than 40,000 gallons. Said tanks are equipped with conservation vents, flame arrestors, and other equipment with similar emission control effect.
EU – HCLTNK	A tank with a capacity of less than 10,000 gallons used to store HCl. The tank uses a gas scrubber using a solution of Caustic Soda (NaOH) as primary control equipment and a resin column to absorb HCl gasses as secondary control equipment.
EU – FERMENTATION	This unit contains the fermentation process done in PR05. The process releases hydrogen sulfide (H ₂ S) and consists of fermenters and preparation tanks.

A list of all the existing processes, emission points and control equipment authorized to operate under this Title V permit is included in the Appendix

Section III – General Conditions of the Permit

- 1. Sanctions and Penalties:** The permit holder is obliged to comply with all the terms, conditions, requirements, limitations, and restrictions established in this permit. Any violation of the terms of this permit shall be subject to administrative, civil or criminal measures, as established under Article 16 of the Environmental Public Policy Act (Public Law Number 416 of September 22, 2004).
- 2. Right of Entry:** Pursuant to the provisions of Rules 103 and 603(c)(2) of the RCAP, the permit holder shall grant access to EQB representatives to its facilities, upon presentation of credentials, to perform the following:
 - a) Enter upon any premises where an emission source is located, or where atmospheric emission-related activities are conducted, or where records must be kept under the conditions of the permit, the agreement with the RCAP, or the US Clean Air Act;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit, the agreement with the RCAP or the US Clean Air Act;
 - c) Inspect and examine any facilities, equipment (including monitoring equipment and atmospheric pollution control equipment), practices or operations (including methods used for quality control) regulated or required under the permit, and perform emission and fuel sampling;
 - d) As authorized by the Act and the Regulations, sample at reasonable times, substances or parameters for the purpose of assuring compliance with the permit and other applicable requirements.
- 3. Sworn Statement:** All reports required pursuant to Rule 103(D) of the RCAP (to wit, semiannual sampling reports and annual certification of compliance), shall be submitted together with a sworn statement or affidavit of the Responsible Official or authorized representative. Such sworn statement shall attest to the truthfulness, correctness, and completeness of such records and reports.
- 4. Data Availability:** As provided by rule 104 of the RCAP, all emissions data obtained by or submitted to the EQB, including data reported pursuant to Rule 103 of the RCAP, and any data otherwise obtained, shall be available for public inspection and may also be made available to the public in any additional ways that the EQB may deem appropriate, except when at the request of the petitioner, The Governing Board has determined that

the information is confidential, pursuant to the procedure established by Resolution R-83-7-4 of March 2, 1983.

- 5. Emergency Plan:** Pursuant to Rule 107 (B) of the RCAP, the permit holder shall have an Emergency Response Plan available, which must be consistent with adequate safety practices, and which provides for the reduction or retention of facility emissions during periods classified by the EQB as alerts, warnings, or emergencies. These plans will identify the source of the emission, include the reduction to be achieved for each source and the means by which such reduction will be accomplished. These plans will be available for inspection by any authorized EQB representative, at any time.

- 6. Control Equipment:** For all control equipment required or claimed in this permit, the permit holder shall comply with Rule 108 of the RCAP, as follows
 - (A) All air pollution control equipment or control measure shall provide the control needed for continuous compliance with applicable rules and regulations. Such equipment or measures shall be installed, maintained, and operated according to those conditions imposed by this Title V Permit, within the operational limits specified by the manufacturer.

 - (B) The material collected from the air pollution control equipment shall be disposed of in accordance with applicable rules and regulations. The removal, handling, transport, storage, treatment or disposal shall be done in such a way that it will not produce environmental degradation, and in accordance with applicable rules and regulations.

 - (C) The EQB may require the installation and maintenance of additional, complete, and separate air pollution control equipment of a capacity equal to the capacity of the primary control equipment, when deemed appropriate to safeguard the health and welfare of human beings. Furthermore, the Board may require that such additional air pollution control equipment be operated continuously and together with the primary air control equipment regularly required.

 - (D) All air pollution control equipment shall be operated at all times when the emission source being controlled is in operation.

 - (E) In case of a shutdown of air pollution control equipment for the necessary scheduled maintenance, the Board shall be informed² of the intention to shutdown such equipment, at least three days prior to the planned shutdown. Such prior notice shall include, but is not limited to:

2 The certification shall be addressed to: Manager, Air Quality Area, Box 11488, Santurce, PR 00910.

- (1) Identification of the specific source to be removed from service, including its location and permit number.
 - (2) The expected length of time that the air pollution control equipment will be out of service.
 - (3) The nature and quantity of the air pollutants that are likely to be emitted during the control equipment shutdown period.
 - (4) Special measures to be taken to minimize the duration of the control equipment shutdown period, such as the use of irregular personnel and additional equipment.
 - (5) The reasons why it will be impossible or impractical to shutdown the operations of the facility during the maintenance period.
- (F) To the extent possible, maintain and operate any affected source and associated air pollution control equipment at all times, including startup, shutdown and malfunction periods, and shall do so in a manner that is consistent with the original manufacturer's design specifications, and in compliance with applicable rules and regulations and permit conditions.
- (G) The permit holder shall keep copies of the monthly calibration and inspections reports of all control equipment such as dust collectors and gas scrubbers. The permit holder shall maintain a record of all control equipment shutdown incidents if processes continue to operate. Said records must be available to EQB personnel, if required.

7. Certification of Compliance: Pursuant to Rule 602(C)(2)(ix)(c) of the RCAP, the permit holder must submit, both to the EQB and the EPA³ a certification of compliance no later than 60 days after the anniversary date of the permit. The Certification of Compliance must include the information required pursuant to Rule 603(c) of the RCAP.

8. Regulatory Compliance: Pursuant to Rule 115 of the RCAP, in case of infraction of the RCAP or any other applicable rule or regulation, the EQB may suspend, modify or revoke any relevant permit, approval, variance or other authorization issued by the EQB.

3 The EQB certification shall be addressed to: Manager, Air Quality Area, Box 11488, Santurce, PR 00910. The EPA certification shall be addressed to: Chief, Permitting Section, Air Program Branch, EPA Region II, 290 Broadway, New York, NY, 10007.

9. Location Approval: Pursuant to Rule 201 of the RCAP, nothing in this permit shall be construed as authorizing the location or construction of a major stationary source, or the significant modification of a major stationary source, without first obtaining a location approval from the EQB, and without showing compliance with the National Ambient Air Quality Standards (NAAQS). This permit does not authorize the construction of a new minor source without first obtaining a construction permit as provided under Rule 203 of the RCAP.

10. Open Burning: Pursuant to Rule 402 of the RCAP, the permit holder shall not cause or permit the open burning of refuse in the premises except as provided in paragraph (E) of said rule which authorizes fire fighting training or investigation of fire fighting techniques. The permit holder shall:

- a) Keep records of training or investigation-related fire fighting activities. These records shall be available upon request.
- b) Submit to the Board, on an annual basis, a schedule of the training or investigation-related fire fighting activities and notify the Board seven days in advance of the date of each activity.

11. Fugitive Emissions of Particulate Matter: Pursuant to Rule 404 of the RCAP, the permit holder shall not cause or permit:

- a) any materials to be handled, transported or stored in a building or its appurtenances, or a road to be used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.
- b) visible emissions of fugitive dust beyond the boundary line of the property on which the emissions originate.

12. Objectionable odors: Pursuant to Rule 420 of the RCAP, no permit holder shall cause or permit the emission to the atmosphere of matter that produces *objectionable or disagreeable* odors that can be perceived in an area other than that designated for industrial purposes. The permit holder shall show compliance with Rule 420 (A)(1) as follows: if an odors committee designated by the Board detects objectionable odors beyond the area designated for industrial purposes and complaints are received, the permit holder shall investigate and take measures to minimize or eliminate the objectionable odors, as needed. [State enforceable condition.]

13. Permit Renewal Applications: Pursuant to Rule 602(a)(1)(iv) of the RCAP, the permit holder shall submit a permit renewal application to the EQB at least 12 months prior to its expiration date. The responsible official shall certify each of the forms required pursuant to paragraph (c)(3) of Rule 602 of the RCAP.

14. Permit Duration: Pursuant to Rule 603 of the RCAP, the following terms will apply for the duration of this permit:

- a) **Effective Date:** The permit shall be valid after being signed by the Governing Board of the Environmental Quality Board.
- b) **Expiration:** This authorization shall have a fixed term of five years from its Effective Date. The expiration date shall be automatically extended until the EQB approves or denies an application for renewal only when the permit holder submits a complete renewal application at least twelve (12) months prior to the expiration date; [Rules 603 (a)(2), 605 (c)(2), 605 (c)(4) of the RCAP.]
- c) **Permit Shield:** Pursuant to Rule 605(c)(4)(i) of the RCAP, the permit shield may be extended beyond the original permit term until the permit renewal has been issued, only if a complete renewal has been submitted on time.
- d) Should the permit be challenge by third parties, the permit shall remain in effect until a court of justice with jurisdiction revokes it.

15. Recordkeeping Requirements: Pursuant to Rule 603(a)(4)(ii) of the RCAP, the permit holder must keep records of all required monitoring data and support information for 5 years from the date of the monitoring sample, measurement, report, or application.

16. Sampling Reporting Requirements: Pursuant to Rule 603(a)(5)(i) of the RCAP, the permit holder must submit reports of any required monitoring every six months, or more frequently if required by the EQB or any other applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Rule 602(c)(3) of the RCAP.

17. Reporting of Deviations Due to Emergency: Pursuant to Rule 603(a)(5)(ii) of the RCAP, any deviation attributable to upset conditions (such as sudden failure or rupture) or emergency as defined in Rule 603(e) of the RCAP must be reported within two working days. Said notification may be used as an affirmative defense should any action be brought against the permit holder. If the permit holder asserts the emergency defense in an action for compliance, the permit holder shall have the burden of proof to show that the deviation was a result of an emergency and that the Board was adequately notified. If such deviation for emergency were to extend beyond 24 hours, the affected units may be operated until the end of the cycle or 48 hours, whichever comes first. The Board may only extend the operation of an existing source of emission beyond 48 hours if the source were to show, to the Board's Satisfaction, that the National Ambient Air Quality Standards (NAAQS) would not be exceeded and it would not constitute a risk to public health.

18. Notification of Deviations (Hazardous Air Pollutants): The source shall immediately cease to operate or act as stipulated in its Emergency Response Plan (established in Rule 107 (C)), when said plan has demonstrated that there is no significant impact in premises other than those designated for industrial use. (State enforceable condition) Pursuant to Rule 603 (a)(5)(ii)(b) of the RCAP, the Board shall be notified within 24 business hours of any deviation that results in a release of emissions of hazardous air pollutants that continues for more than one hour in excess of the applicable limit. In case of a release of any regulated air pollutant that continues for more than 2 hours in excess of the applicable limit, the Board shall be notified within 24 business hours of the deviation.⁴ The permit holder shall, also, within 7 calendar days, submit to the EQB a written detailed report including the probable causes, time and duration of the deviation, remedial action taken, and steps that are being undertaken to prevent a reoccurrence.

19. Severability Clause: Pursuant to Rule 603(a)(6) of the RCAP, the permit clauses are severable. In the event of a successful challenge to any part of the permit in an administrative or judicial forum, or should any of the clauses of the permit be declared invalid, said determination shall not affect the remaining clauses herein, including those that deal with emission limits, terms and conditions, whether specific or general, and sampling requirements, and maintenance of records and reports.

4 The report shall be addressed to: Manager, Air Quality Area, Box 11488, Santurce, PR 00910.

- 20. Noncompliance with the Permit:** Pursuant to Rule 603(a)(7)(i) of the RCAP, the permit holder must comply with all the conditions of the permit. Any permit noncompliance constitutes a violation of the Regulations and shall be grounds for enforcement action, sanctions, revocation, termination, modification, reissuance of the permit, or for denial of a permit renewal application.
- 21. Non-permissible Defense:** Pursuant to Rule 603(a)(7)(ii) of the RCAP, the permit holder may not allege as defense 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 the permit.
- 22. Modification and Revocation of the Permit:** Pursuant to Rule 603(a)(7)(iii) of the RCAP, the permit may be modified, revoked, reopened, reissued or terminated for cause. The filing of a request by the permit holder for a permit modification, revocation and reissuance or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit conditions.
- 23. Property Rights:** Pursuant to Rule 603(a)(7)(iv) of the RCAP, this permit does not create or convey any property rights of any sort, or any exclusive privilege.
- 24. Obligation to Furnish Information:** Pursuant to Rule 603(a)(7)(v) of the RCAP, the permit holder shall furnish the EQB, within a reasonable time, any information that the EQB may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permit holder shall also furnish to the EQB copies of records required to be kept by the permit.
- 25. Change of Operating Scenario:** Pursuant to Rule 603(a)(10) of the RCAP, the permit holder shall, contemporaneously with making a change from one operating scenario to another, record in a log the scenario under which it is operating. This record shall be kept in the facilities at all times.
- 26. Final Action:** Pursuant to Rule 605(d) of the RCAP, no permit shall be deemed issued by default as a result of the EQB's failure to take final action on a permit application within 18 months. The EQB's failure to issue a final permit within 18 months should be treated as a final action solely for the purpose of obtaining judicial review in state court.

27. Administrative Amendments and Permit Modifications: Pursuant to Rule 606 of the RCAP, no amendments or changes that qualify as permit revisions may be made to the permit without first complying with the administrative amendments and permit modifications requirements established by the RCAP.

28. Permit Reopening: Pursuant to Rule 608(a)(1) of the RCAP, the permit may be reopened and reviewed for any of the following circumstances:

- a) When additional requirements under any law or regulation become applicable to the permit holder with a remaining permit term of three (3) or more years. Such a reopening shall be completed eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to Rule 605(c)(4)(i) or 605(c)(4) (ii) of the RCAP.
- b) When the EQB or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
- c) When the EQB or the EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

29. Change of Name or Ownership: This permit is issued to Lilly del Caribe, Inc. Should the name of the company or facility change, or should it be transferred to a different owner, the new responsible official must submit a sworn statement accepting and agreeing to comply with all the conditions established in this permit.

30. Renovation / Demolition Activities: The permit holder must comply with the provisions under 40 CFR 61.145 and 61.150 and Rule 422 of the RCAP when carrying out any renovation or demolition of materials containing asbestos in its facilities.

31. Risk Management Plan: If during the effective date of this permit, the permit holder were subject to 40 CFR Part 68, said permit holder must submit a Risk Management Plan in accordance with the schedule of compliance in 40 CFR Part 68.10. If during the effectiveness of this permit, the permit holder were subject to 40 CFR Part 68, as part of the annual certification of compliance required under 40 CFR 70, said permit holder must include a certification of compliance with the requirements of Part 68, including recordkeeping and Risk Management Plan. The permit holder must comply with the general obligation requirements of section 112(r)(1) of the Act as follows:

- a) Identify the risks that may result in accidental leaks using appropriate risk evaluation techniques.
- b) Design, maintain, and operate a safe facility.
- c) Minimize the consequences of accidental leaks, should they occur.

32. Refrigerant Requirements (Climate Protection and Protection of Stratospheric Ozone):

- a) In the event that the permittee has equipment or appliances, including air conditioners, that use refrigerants with Class I or II rating under 40 CFR Part 82, Subpart A, Appendices A and B, it must provide maintenance, service or repair according to the practices, personnel certification requirements, disposal requirements, and certification of recycling and recovery equipment pursuant to 40 CFR Part 82, Subpart F.
- b) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchases and the refrigerant added to such appliances pursuant to §82.166.
- c) Servicing of Motor Vehicles: The permit holder must comply with all applicable requirements under 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners, if the permit holder repairs air conditioners on a motor vehicle involving refrigerant substances (or regulated substitute substances) that affect the ozone layer. The term motor vehicle, as used in Subpart B, does not include compressed air cooling systems used as refrigerated cargo or systems using HCFC-22 refrigerant used on passenger buses.

33. Labeling of Products Using Ozone-Depleting Substances: The permit holder must comply with the labeling standards for products using ozone-depleting substances in accordance with 40 CFR, Part 82, Subpart E.

- a) All containers used to store or transport a class I or class II substance, all containers containing a class I substance, and all products manufactured directly with a class I substance must bear the required warning statement if they are to be introduced into interstate commerce pursuant to §82.106.
- b) The placement of the required warning statement shall meet the requirements of §82.108.

- c) The form of the label bearing the warning statement must meet the requirements of §82.110.
- d) No person will modify, remove, or interfere with the required warning statement except as described in §82.112.

34. Weatherproofing of Roof Surfaces: State enforceable requirement. The permit holder shall not cause or permit hot tar or any other weatherproofing material containing organic compounds to be applied without the prior authorization of the Board. The use of used oils or hazardous wastes for weatherproofing is prohibited.

35. Compliance Clause: Compliance with the permit shall in no way exempt the permit holder from complying with all other state and federal laws, regulations, permits, administrative orders or applicable judicial decrees.

36. Calculation of Emissions: On April 1st of each year, the permit holder shall send the estimate of real or permissible emissions for the previous calendar year. [State enforceable condition.] The estimate of emissions shall be provided in the forms prepared by the EQB for such purposes. The responsible official will certify that all the information submitted is correct, true and representative of the permitted activity. On June 30 of each year, or earlier, the permit holder shall pay for the emissions of the previous calendar year.

37. Annual Fee: The permit holder shall submit an annual payment based on real emissions of regulated pollutants at a rate of \$37.00 per ton unless the Board determines a different fee based on the provisions of Rule 610(b)(2)(iv) of the RCAP. Payment shall be made on June 30 of each year or earlier.

38. Reservation of Rights or Reserved Rights: Except as expressly provided in this Title V permit:

- a) Nothing herein shall bar the Board or the EPA from taking administrative or legal action to enforce the terms of the Title V permit, including, but not limited to, the right to request an injunction, impose statutory penalties, fines and punitive damages.
- b) Nothing herein shall be construed as a limitation of the rights of the Board or the EPA to take any criminal action against the permit holder or any other person.

- c) Nothing herein shall be construed as a limitation of the authority of the Board or the EPA to take any action in response to conditions that constitute a substantial and imminent danger to the health or well being of the public or the environment.
- d) Nothing herein shall be construed as a limitation of the right of the permit holder to an administrative hearing and judicial review of a termination/ revocation/ denial action pursuant to the Environmental Public Policy Act and Regulations.

39. Source Modifications without a permit revision: According to Rule 607 of the RCAP, Lilly del Caribe, Inc. may perform:

a) Source changes:

- 1) Permitted sources may make Section 502(b)(10) changes without requiring a permit revision, if the changes are not modifications under any provision of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions).
 - (i) For each such change, the facility must provide the Administrator and the Board with written notification in advance of the proposed changes, which shall be seven (7) days. The written notification shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The source, the Board, and EPA shall attach each such notice to their copy of the relevant permit.
 - (ii) The permit shield described in paragraph (d) of Rule 603 shall not apply to any change made pursuant to section (a)(1) of Rule 607.
- 2) Permitted sources may trade increases and decreases in emissions in the permitted facility for the same pollutant, where the permit provides for such emissions trades without requiring a permit revision and based on the 7-day notice prescribed in section (a)(2) of Rule 607. This provision is available in those cases where the permit does not already provide for such emissions trading.
 - (i) Under paragraph (a)(2) of Rule 607, the written notification required shall include such information as may be required by the provision in

the Puerto Rico State Implementation Plan (PR-SIP) authorizing the emissions trade, including when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the PR-SIP, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the PR- SIP and that provide for the emissions trade.

(ii) The permit shield described in paragraph (d) of Rule 603 shall not extend to any change made under section (a)(2) of Rule 607. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade.

3) If a permit applicant requests it, the Board shall issue permits that contain terms and conditions (including all terms required under sections (a) and (c) of Rule 603 to determine compliance) allowing for the trading of emissions increases and decreases in the permitted facility solely for the purpose of complying with a federally-enforceable emissions cap. Such a cap must be established in the permit independent of otherwise applicable requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The Board shall not be required to include in the emissions trading provisions any emissions units for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all applicable requirements.

(i) Under section (a)(3) of Rule 607, the written notification required shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of the permit.

(ii) The permit shield described in paragraph (d) of Rule 603 may extend to terms and conditions that allow such increases and decreases in emissions.

b) Off-Permit Changes: The Board may allow changes that are not addressed or prohibited by the permit and/or State Law.

- 1) A permitted facility may make changes without obtaining a permit revision if such changes are not addressed or prohibited by the permit, other than those described in paragraph (c) of Rule 607.
 - (i) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (ii) Sources must provide contemporaneous written notice to the Board and EPA of each such change, except for changes that qualify as insignificant under paragraph (c)(1) of Rule 602. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply because of the change.
 - (iii) The change shall not qualify for the permit shield under paragraph (d) of Rule 603.
 - (iv) The permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- c) A permitted facility cannot make changes without a permit revision if such changes are modifications under any provision of Title I of the Act.

40. Others source modifications without require permit revisions

- a) Lilly del Caribe, Inc. may make changes under section 502(b)(10) of the Act without requiring a permit revision if such changes:
 - 1) are not modifications under any provision of Title I of the Act,
 - 2) do not exceed the allowable emissions under the permit,
 - 3) do not result in the emission of any pollutant not previously emitted,
 - 4) do not violate any applicable requirement or contravene federally enforceable terms and permit conditions such as monitoring (including test methods), recordkeeping, reporting and compliance certification requirements,

- 5) are not changes under Title I of the Act to an emission limit, a work practice or a voluntary emission cap.
- b) Rule 203 of the RCAP is required for any construction or modification of an emission source. For purposes of part II of the RCAP, a modification is defined as any physical change in, change in the method of operation or a change in type of fuel used of an existing stationary source, that would result in a net increase in that stationary source's potential to emit any air pollutant (subject to any standard), or which results in the emission of any pollutant (subject to any standard) not previously emitted. A physical change shall not include routine maintenance, repair and the replacement of any equipment having the same capacity, equal efficiency or greater environmental benefit to be used for the same purpose.
- c) The written notification addressed in condition 39(a)(1)(i) refers to changes covered under condition 39(a)(1). Changes not covered will be processed under the requirements of Rule 203 of the RCAP.
- d) Any emission trading as provided in condition 39(a)(2) above will not be authorized if the facility does not provide the reference to the PR-SIP provisions authorizing such emissions trading.
- e) If Lilly requests so, the Board may allow the emission trading in the facility solely for the purpose of complying with a federally-enforceable emissions cap. The application shall be based in replicable procedures and shall include permit terms that ensure the emission trades are quantifiable, replicable and enforceable.
- f) Off- permit changes will not be exempt from complying with the requirements and procedures of Rule 203 of the RCAP, if applicable.

Section IV – Emission Limits and Provisions

This section contains the specific enforceable permit conditions as regards the applicable requirements and the methods to show compliance. The tables below contain a summary of the applicable requirements together with the methods required to show compliance for all emission units identified in Section I.

A. Installation Requirements

The “potential” emissions described below represent the emissions of the facility at the time of the permit application and will be used for payment purposes. According to Resolution R-97-47-1, emission calculations will be based in Lilly actual emissions, although there will be accepted calculations based on permissible emission of the source. If Lilly wants to realize the calculations based on permissible emission will pay the same charge for tons that the sources that realize the calculations basing on actual emissions. Also, when Lilly del Caribe Inc. requests a modification, administrative change or minor modification to this permit Title V, Lilly will only have to pay the quantity for ton based on the increase in emission for ton caused, if someone, for the change and not the totality of the charges in accordance with the Rule 610 (a) of the RCCA.

POLLUTANT	POTENTIAL EMISSIONS (TONS / YEAR)
PM ₁₀	134.4
SO ₂	531.8
NO _x	246.4
CO	53.9
VOC	81.4
Methanol	2.0
Acetonitrile	6.2
HCl	4.0
H ₂ S	4.64

Section V – Permit Conditions

A. Operational Limits

The tables below summarize the applicable requirements and the test method for the remaining emission units of Section II of this permit.

1. EU – HFOBOILER-1

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
SO ₂ Emission Limit	Sulfur content	2.5	Percent by weight	Analysis by supplier	Certification by fuel supplier	Every time fuel is received	Monthly
Visible emissions limit	Visible emissions	20	Six minute averaging percent	Method 9	Once during the first year of the permit	With every reading	Sixty days from the day of the reading.
				Visible emissions	Weekly	Keep records	Annually
Emission limit for particulate matter	Particulate Matter	0.3	Pounds per million Btu	AP-42 emission calculation	Annually	Emission calculation log	Annually

a. Fuel Consumption

- (i) Boilers are authorized to operate 24 hrs/day, 365 days/yr, therefore, they have no restrictions on fuel consumption. The liquid fuel consumption potential for each, based on continuous operation, is 744,600 gallons/yr.

b. Sulfur Emission Limit

- (i) The sulfur content of oxidized liquid fuel shall not exceed 2.5%. [PFE-16-0692-0843-I-II-O]
- (ii) To comply with the requirement to maintain a daily record of the sulfur content of burned fuel, the permit holder shall retain a supplier-certified copy indicating the sulfur content of the fuel. The permit holder shall obtain a sulfur content analysis with each fuel delivery using Method ASTM 4294, ASTM 2880-71 or any other equivalent method approved by the EQB or the EPA.

- (iii) Pursuant to Rule 603(a)(4)(ii) of the RCAP, the permit holder must keep records of all required sampling data and support information for 5 years from the date of the sampling, measurement, report or sampling application. This includes a record of the fuel sampling results, monthly reports of fuel consumption and sulfur content for the burned fuels.
- (iv) Pursuant to Rule 410(F) of the RCAP, during the first 15 days of the month following the reported month, the permit holder must submit a monthly report indicating the fuel consumption and the percent sulfur content by weight of the burned fuels, for each unit.

c. Visible Emissions Limit

- (i) The permit holder shall not exceed the 20% opacity limit in a six-minute average. However, pursuant to Rule 403 (A) of the RCAP, it may discharge visible emissions of opacity of up to 60% for a period of no more than 4 minutes in any consecutive 30-minute interval.
- (ii) Lilly shall hire an independent opacity reader, certified by an institution endorsed by the EPA to perform an opacity reading for each boiler's stack during the first year of the permit using Method 9 of 40 CFR part 60, Appendix A. The Method 9 inspection must determine average opacity in a total of 24 observations within a six-minute period. Boilers must be in operation at the time of the opacity reading.
- (iii) A sampling protocol shall be submitted to the EQB at least thirty (30) days prior to the start of the test for approval. This protocol must include the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP).
- (iv) At least fifteen (15) days prior written notification of any sampling, shall be provided to the Board, to afford the EQB the opportunity to have an observer present. [Rule 106 (D) of the RCAP]
- (v) Two copies of the results of the sampling report shall be submitted within sixty (60) days of the test. This report will include the information required by Rule 106 (E) of the RCAP.

- (vi) Lilly shall perform weekly visual opacity inspections during the daytime using an Internal Visible Emissions Reader certified by a program endorsed by the EPA or the Board. If the certified reader establishes that there is excess of visible emission, Lilly will verify that the equipment causative of the above mentioned emission is operating in accordance with the manufacturer specifications and the permit conditions. Lilly will take the corrective necessary actions to eliminate the excess of visible emission in accordance to the Rules 403(A)(1) and (2) of the RCCA.
- (vii) In compliance with Rule 603(A)(4)(ii) of the RCAP, Lilly shall retain a copy of the visible emission readings report including the date and time of the readings, for a period of at least five years.
- (viii) Lilly must submit a summary of the visible emissions reports in the annual certification of compliance corresponding to the year in which the readings took place. The summary must include the opacity reading's date performed by an independent opacity reader. Also the summary must include the total number of weekly inspections performed during the year.
- (ix) The Board reserves the right to require additional visible emission readings in order to demonstrate compliance with the opacity limit.

d. Particulate Matter Emission Limit

- (i) The permit holder shall not cause or permit the emission, from any fuel (solid or liquid) burning equipment, of particulate matter in excess of 0.3 lb/MMBtu of heat input. [Rule 406 of the RCAP].
- (ii) To determine compliance with the above condition Lilly shall calculate the PM emissions using the emission factors that apply to the unit and the average rate of fuel heat input as established in Table 1.3-1 of AP-42 (140,000 Btu/gal for Light Fuel Oil and 148,000 Btu/gal for Heavy Fuel Oil).
- (iii) Total heat input shall be the product of the sum of the heat content of fuels whose combustion products pass through a stack. Total heat input for all fuel burning units in a source shall be used to determine the maximum allowable amount of particulate matter to be emitted.

2. EU – HFOBOILER-2

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
SO ₂ Emission limit	Sulfur content	1.5	Percent by weight	Analysis by supplier	Certification by fuel supplier	Every time fuel is received	Monthly
Visible emissions limit	Visible emissions	20	Six minute averaging percent	Method 9	Once during the first year of the permit	With each reading	Sixty days from the day of the reading.
				Visible emissions	Weekly	Keep records	Annually
Particulate matter emissions limit	Particulate matter	0.3	Pounds per million Btu	AP-42 emissions calculation	Annually	Emission calculations log	Annually

a. Fuel Consumption

- (i) This boiler is authorized to operate 24 hrs/day, 365 days/yr, therefore, it is authorized to consume 744,600 gals/yr. [PFE-16-0692-0843-I-II-O]

b. Sulfur Emission Limit

- (i) The sulfur content of oxidized liquid fuel shall not exceed 1.5%. [PFE-16-0692-0843-I-II-O]
- (ii) To comply with the requirement to maintain a daily record of the sulfur content of burned fuel, the permit holder shall retain a supplier-certified copy indicating the sulfur content of the fuel. The permit holder shall obtain a sulfur content analysis with each fuel delivery using Method ASTM 4294, ASTM 2880-71 or any other equivalent method approved by the EQB or the EPA.
- (iii) Pursuant to Rule 603(A)(4)(ii) of the RCAP, the permit holder must keep records of all required sampling data and support information for 5 years from the date of the sampling, measurement, report or sampling application. This includes a record of the fuel sampling results, monthly reports of fuel consumption and sulfur content for the burned fuels.

- (iv) Pursuant to Rule 410(F) of the RCAP, the permit holder, during the first 15 days for the month following the reported month, must submit a monthly report indicating the fuel consumption and the percent sulfur content by weight of the burned fuels for each unit.

c. Visible Emissions Limit

- (i) The permit holder shall not exceed the 20% opacity limit in a six-minute average. However, pursuant to Rule 403 (A) of the RCAP, it may discharge visible emissions of opacity of up to 60% for a period of no more than 4 minutes in any consecutive 30-minute interval.
- (ii) Lilly shall hire an independent opacity reader, certified by an institution endorsed by the EPA to perform an opacity reading for each boiler's stack during the first year of the permit using Method 9 of 40 CFR part 60, Appendix A. The Method 9 inspection must determine average opacity in a total of 24 observations within a six-minute period. Boilers must be in operation at the time of the opacity reading.
- (iii) A sampling protocol shall be submitted to the EQB at least thirty (30) days prior to the start of the test for approval. This protocol must include the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP).
- (iv) At least fifteen (15) days prior written notification of any sampling, shall be provided to the Board, to afford the EQB the opportunity to have an observer present. [Rule 106 (D) of the RCAP]
- (v) Two copies of the results of the sampling report shall be submitted within sixty (60) days of the test. This report will include the information required by Rule 106 (E) of the RCAP.
- (vi) Lilly shall perform weekly visual opacity inspections during the daytime using an Internal Visible Emissions Reader certified by a program endorsed by the EPA or the Board. If the certified reader establishes that there is excess of visible emission, Lilly will verify that the equipment causative of the above mentioned emission is operating in accordance with the manufacturer specifications and the permit conditions. Lilly will take the corrective necessary actions to eliminate the excess of visible emission in accordance to the Rules 403(A)(1) and (2) of the RCCA.

- (vii) In compliance with Rule 603(A)(4)(ii) of the RCAP, Lilly shall retain a copy of the visible emission readings report including the date and time of the readings, for a period of at least five years.
- (viii) Lilly must submit a summary of the visible emissions reports in the annual certification of compliance corresponding to the year in which the readings took place. The summary must include the opacity reading's date performed by an independent opacity reader. Also the summary must include the total number of weekly inspections performed during the year.
- (ix) The Board reserves the right to require additional visible emission readings in order to demonstrate compliance with the opacity limit.

d. Particulate Matter Emission Limit

- (i) The permit holder shall not cause or permit the emission, from any fuel (solid or liquid) burning equipment, of particulate matter in excess of 0.3 lb/MMBtu of heat input. [Rule 406 of the RCAP].
- (ii) To determine compliance with the above condition Lilly shall calculate the PM emissions using the emission factors that apply to the unit and the average rate of fuel heat input as established in Table 1.3-1 of AP-42 (140,000 Btu/gal for Light Fuel Oil and 148,000 Btu/gal for Heavy Fuel Oil).
- (iii) Total heat input shall be the product of the sum of the heat content of fuels whose combustion products pass through a stack. Total heat input for all fuel burning units in a source shall be used to determine the maximum allowable amount of particulate matter to be emitted.

3. EU – LFOBOILER

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
Fuel consumption	No 1 and/or No 2	2,242,897	Gals/yr	Consumption records	Daily	Logs	Annually
SO ₂ Emission limit	Sulfur content	0.5	Percent per weight	Analysis by supplier	Fuel supplier certification	Every time fuel is received	Monthly
Visible emissions limit	Visible emissions	20	Six minute	Método 9	Once during the first year of the	With each reading	Sixty days from the day

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
			averaging percent		permit		of the reading.
				Visible emissions	Weekly	Keep records	Annually
Particulate matter emission limit	Particulate matter	0.3	Pounds per million Btu	AP-42 emission calculation	Annually	Emission calculation log	Annually

a. Fuel Consumption

- (i) Oxidized liquid fuel consumption for this unit shall not exceed 2,242,897 gals/yr for any 365 day rolling period (PFE-16-0203-0187-I-II-C). It is determined by adding that day to the total fuel consumption of the previous 364 days.
- (ii) The permit holder must install and operate flow meters within the first 90 days that the permit is in effect. These flow meters must be calibrated every six months or following the manufacturer's recommendations.

b. Sulfur Emission Limit

- (i) The sulfur content of oxidized liquid fuel shall not exceed 0.5%. [PFE-16-0203-0187-I-II-C)
- (ii) To comply with the requirement to maintain a daily record of the sulfur content of burned fuel, the permit holder shall retain a supplier-certified copy indicating the sulfur content of the fuel. The permit holder shall obtain a sulfur content analysis with each fuel delivery using Method ASTM 4294, ASTM 2880-71 or any other equivalent method approved by the EQB or the EPA.
- (iii) Pursuant to Rule 603(A)(4)(ii) of the RCAP, the permit holder must keep records of all required sampling data and support information for 5 years from the date of the sampling, measurement, report or sampling application. This includes a record of the fuel sampling results, monthly reports of fuel consumption and sulfur content for the burned fuels.
- (iv) The permit holder, during the first 15 days for the month following the

reported year, must submit a report indicating the fuel consumption and the percent sulfur content by weight of the burned fuels for each unit.

c. Visible Emission Limits

- (i) The permit holder shall not exceed the 20% opacity limit in a six-minute average. However, pursuant to Rule 403 (A) of the RCAP, it may discharge visible emissions of opacity of up to 60% for a period of no more than 4 minutes in any consecutive 30-minute interval.
- (ii) Lilly shall hire an independent opacity reader, certified by an institution endorsed by the EPA to perform an opacity reading for each boiler's stack during the first year of the permit using Method 9 of 40 CFR part 60, Appendix A. The Method 9 inspection must determine average opacity in a total of 24 observations within a six-minute period. Boilers must be in operation at the time of the opacity reading.
- (iii) A sampling protocol shall be submitted to the EQB at least thirty (30) days prior to the start of the test for approval. This protocol must include the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP).
- (iv) At least fifteen (15) days prior written notification of any sampling, shall be provided to the Board, to afford the EQB the opportunity to have an observer present. [Rule 106 (D) of the RCAP]
- (v) Two copies of the results of the sampling report shall be submitted within sixty (60) days of the test. This report will include the information required by Rule 106 (E) of the RCAP.
- (vi) Lilly shall perform weekly visual opacity inspections during the daytime using an Internal Visible Emissions Reader certified by a program endorsed by the EPA or the Board. If the certified reader establishes that there is excess of visible emission, Lilly will verify that the equipment causative of the above mentioned emission is operating in accordance with the manufacturer specifications and the permit conditions. Lilly will take the corrective necessary actions to eliminate the excess of visible emission in accordance to the Rules 403(A)(1) and (2) of the RCCA.
- (vii) In compliance with Rule 603(A)(4)(ii) of the RCAP, Lilly shall retain a copy of the visible emission readings report including the date and time of

the readings, for a period of at least five years.

- (viii) Lilly must submit a summary of the visible emissions reports in the annual certification of compliance corresponding to the year in which the readings took place. The summary must include the opacity reading's date performed by an independent opacity reader. Also the summary must include the total number of weekly inspections performed during the year.
- (ix) The Board reserves the right to require additional visible emission readings in order to demonstrate compliance with the opacity limit.

d. Particulate Matter Emission Limit

- (i) The permit holder shall not cause or permit the emission, from any fuel (solid or liquid) burning equipment, of particulate matter in excess of 0.3 lb/MMBtu of heat input. [Rule 406 of the RCAP].
- (ii) To determine compliance with the above condition Lilly shall calculate the PM emissions using the emission factors that apply to the unit and the average rate of fuel heat input as established in Table 1.3-1 of AP-42 (140,000 Btu/gal for Light Fuel Oil).
- (iii) Total heat input shall be the product of the sum of the heat content of fuels whose combustion products pass through a stack. Total heat input for all fuel burning units in a source shall be used to determine the maximum allowable amount of particulate matter to be emitted.

4. EU – GT500EMGEN-4

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
Fuel consumption	No 2	<u>150,218</u>	Gals/yr	Fuel consumption based on hours of operation	Monthly	Record of hours of operation and fuel consumption calculation	Annually
SO ₂ emissions limit	Sulfur content	<u>0.05</u>	Percent per weight	Analysis by supplier	Certification by fuel supplier	Each time fuel is received	Annually
Visible emissions limit	Visible emissions	20	Six minute averaging	Method 9	Once during the first year of the permit	With each reading	Sixty days from the date of the reading.

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
			percent	Visible emissions	Monthly	Keep records	Annually

a. Fuel Consumption

- (i) The fuel consumption limit allowed (in gallons per year) for this unit shall be determined according to the following equation:

<u>If combined boiler consumption (EU – LFOBOILER) is...</u>	<u>Then the fuel consumption limit allowed for the generators (EU – GT500EMGEN4) is...</u>
> 1,123,574	$100,248 + \frac{(2,242,897 - \text{fuel used in boilers}) \times 44.643}{1,000}$
≤ 1,123,574	150,218

- (ii) The permit holder may install flow meters to determine consumption. If it does, the flow meters shall be calibrated every six months or following the manufacturer’s recommendations.
- (iii) Monthly fuel consumption shall be determined using any of the following methods:

Method	Type of Record
Fuel Flow Meters	<ul style="list-style-type: none"> • Monthly fuel consumption record • Record of flow meter calibrations
Hours of Operation	<ul style="list-style-type: none"> • Record of the monthly operating hours to determine consumption • Evidence of manufacturer specifications of consumption per hour for each equipment

b. Sulfur Emission Limit

- (i) The sulfur content of liquid fuel number 2 shall not exceed 0.05%. [PFE-16-0203-0187-I-II-C]
- (ii) To comply with the requirement to maintain a daily record of the sulfur content of burned fuel, the permit holder shall retain a supplier-certified copy indicating the sulfur content of the fuel. The permit holder shall obtain a sulfur content analysis with each fuel delivery using Method ASTM 4294, ASTM 2880-71 or any other equivalent method approved by the EQB or the EPA.
- (iii) Pursuant to Rule 603(A)(4)(ii) of the RCAP, the permit holder must keep records of all required sampling data and support information for 5 years from the date of the sampling, measurement, report or sampling application. This includes a record of the fuel sampling results, monthly reports of fuel consumption and sulfur content for the burned fuels.
- (iv) The permit holder, during the first 15 days for the month following the reported year, must submit a yearly report indicating the fuel consumption and the percent sulfur content by weight for the burned fuels for each unit.

c. Visible Emissions Limit

- (i) The permit holder shall not exceed the 20% opacity limit in a six-minute average. However, pursuant to Rule 403(A) of the RCAP, it may discharge visible emissions of opacity of up to 60% for a period of no more than 4 minutes in any consecutive 30-minute interval.
- (ii) Lilly shall hire an independent opacity reader, certified by an institution endorsed by the EPA to perform an opacity reading for each generator's stack during the first year of the permit using Method 9 of 40 CFR part 60, Appendix A. The Method 9 inspection must determine average opacity in a total of 24 observations within a six-minute period. Generators must be in operation at the time of the opacity reading.
- (iii) A sampling protocol shall be submitted to the EQB at least thirty (30) days prior to the start of the test for approval. This protocol must include the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP).

- (iv) At least fifteen (15) days prior written notification of any sampling, shall be provided to the Board, to afford the EQB the opportunity to have an observer present. [Rule 106 (D) of the RCAP]
- (v) Two copies of the results of the sampling report shall be submitted within sixty (60) days of the test. This report will include the information required by Rule 106 (E) of the RCAP.
- (vi) Lilly shall perform weekly visual opacity inspections during the daytime using an Internal Visible Emissions Reader certified by a program endorsed by the EPA or the Board. If the certified reader establishes that there is excess of visible emission, Lilly will verify that the equipment causative of the above mentioned emission is operating in accordance with the manufacturer specifications and the permit conditions. Lilly will take the corrective necessary actions to eliminate the excess of visible emission in accordance to the Rules 403(A)(1) and (2) of the RCCA.
- (vii) In compliance with Rule 603(A)(4)(ii) of the RCAP, Lilly shall retain a copy of the visible emission readings report including the date and time of the readings, for a period of at least five years.
- (viii) Lilly must submit a summary of the visible emissions reports in the annual certification of compliance corresponding to the year in which the readings took place. The summary must include the opacity reading's date performed by an independent opacity reader. Also the summary must include the total number of weekly inspections performed during the year.
- (ix) The Board reserves the right to require additional visible emission readings in order to demonstrate compliance with the opacity limit.

5. EU – GT500EMGEN-2

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
Fuel consumption	No 2	167,215	Gals/yr	Fuel consumption based on hours of operation	Monthly	Record of hours of operation and fuel consumption calculation	Annually
SO ₂ emissions limit	Sulfur content	0.5	Percent per weight	Analysis by supplier	Certification by fuel supplier	Every time fuel is received	Monthly

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
Visible emissions limit	Visible emissions	20	Six minute averaging percent	Method 9	Once during the first year of the permit	With each reading	Sixty days from the day of the reading.
				Visible emissions	Monthly	Keep records	Annually

a. Fuel Consumption

- (i) Liquid fuel consumption for this unit shall not exceed 167,215 gal/yr for any 12-month rolling period (PFE-16-0400-0723-II-C). It is determined by adding that month’s consumption to the total fuel consumption for the previous 11 months.
- (ii) The permit holder may install flow meters to determine consumption. If it does, the flow meters shall be calibrated every six months or following the manufacturer’s recommendations.
- (iii) Monthly fuel consumption shall be determined using any of the following methods:

Method	Type of Record
Fuel Flow Meters	<ul style="list-style-type: none"> • Monthly fuel consumption record • Record of flow meter calibrations
Hours of Operation	<ul style="list-style-type: none"> • Record of the monthly operating hours to determine consumption • Evidence of manufacturer specifications of consumption per hour for each equipment

b. Sulfur Emission Limit

- (i) The sulfur content of liquid fuel number 6 shall not exceed 0.5%. [PFE-16-0400-0723-II-C]
- (ii) To comply with the requirement to maintain a daily record of the sulfur content of burned fuel, the permit holder shall retain a supplier-certified copy indicating the sulfur content of the fuel. The permit holder shall

obtain a sulfur content analysis with each fuel delivery using Method ASTM 4294, ASTM 2880-71 or any other equivalent method approved by the EQB or the EPA.

- (iii) Pursuant to Rule 603(A)(4)(ii) of the RCAP, the permit holder must keep records of all required sampling data and support information for 5 years from the date of the sampling, measurement, report or sampling application. This includes a record of the fuel sampling results, monthly reports of fuel consumption and sulfur content for the burned fuels.
- (iv) Pursuant to Rule 410(F) of the RCAP, the permit holder, during the first 15 days for the month following the reported month, must submit a monthly report indicating the fuel consumption and the percent sulfur content by weight of the burned fuels for each unit.

c. Visible Emissions Limit

- (i) The permit holder shall not exceed the 20% opacity limit in a six-minute average. However, pursuant to Rule 403 (A) of the RCAP, it may discharge visible emissions of opacity of up to 60% for a period of no more than 4 minutes in any consecutive 30-minute interval.
- (ii) Lilly shall hire an independent opacity reader, certified by an institution endorsed by the EPA to perform an opacity reading for each generator's stack during the first year of the permit using Method 9 of 40 CFR part 60, Appendix A. The Method 9 inspection must determine average opacity in a total of 24 observations within a six-minute period. Generators must be in operation at the time of the opacity reading.
- (iii) A sampling protocol shall be submitted to the EQB at least thirty (30) days prior to the start of the test for approval. This protocol must include the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP).
- (iv) At least fifteen (15) days prior written notification of any sampling, shall be provided to the Board, to afford the EQB the opportunity to have an observer present. [Rule 106 (D) of the RCAP]
- (v) Two copies of the results of the sampling report shall be submitted within sixty (60) days of the test. This report will include the information required by Rule 106 (E) of the RCAP.

- (vi) Lilly shall perform weekly visual opacity inspections during the daytime using an Internal Visible Emissions Reader certified by a program endorsed by the EPA or the Board. If the certified reader establishes that there is excess of visible emission, Lilly will verify that the equipment causative of the above mentioned emission is operating in accordance with the manufacturer specifications and the permit conditions. Lilly will take the corrective necessary actions to eliminate the excess of visible emission in accordance to the Rules 403(A)(1) and (2) of the RCCA.
- (vii) In compliance with Rule 603(A)(4)(ii) of the RCAP, Lilly shall retain a copy of the visible emission readings report including the date and time of the readings, for a period of at least five years.
- (viii) Lilly must submit a summary of the visible emissions reports in the annual certification of compliance corresponding to the year in which the readings took place. The summary must include the opacity reading's date performed by an independent opacity reader. Also the summary must include the total number of weekly inspections performed during the year.
- (ix) The Board reserves the right to require additional visible emission readings in order to demonstrate compliance with the opacity limit.

6. EU – NSPSBOILERS

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
Fuel consumption	No 1	4,504,519	Gals/yr	Consumption records	Daily	Logs	Annually
SO ₂ Emission Limit	Sulfur content	0.2	Percent by weight	Analysis by supplier	Certification by fuel supplier	Every time fuel is received	Monthly
Visible emissions limit	Visible emissions	20	Six minute averaging percent	Method 9	Once during the first year of the permit	With every reading	Sixty days from the day of the reading.
				Visible emissions	Weekly	Keep records	Annually
Emission limit for particulate matter	Particulate Matter	0.3	Pounds per million Btu	AP-42 emission calculation	Annually	Emission calculation log	Annually

a. Fuel Consumption

- (i) The consumption of oxidized liquid fuel number 1 for this unit shall not exceed 4,504,519 gallons per year for any 365-day rolling period, provided the generators in EU-GT500EMGEN-3 do not consume fuel during this same period. (PFE-16-0203-0187-I-II-C). Total fuel consumption shall be determined by adding that day's consumption to the fuel consumption for the previous 364 days.
- (ii) The permit holder must install flow meters prior to beginning to operate the boilers. These meters shall be in operation at all times when the corresponding boiler is in operation and they must be calibrated every six months or following the manufacturer's recommendations.

b. Sulfur Emission Limit

- (i) The sulfur content of oxidized liquid fuel shall not exceed 0.2%. [PFE-16-0203-0187-I-II-C]
- (ii) To comply with the requirement to maintain a daily record of the sulfur content of burned fuel, the permit holder shall retain a supplier-certified copy indicating the sulfur content of the fuel. The permit holder shall obtain a sulfur content analysis with each fuel delivery using Method ASTM 4294, ASTM 2880-71 or any other equivalent method approved by the EQB or the EPA.
- (iii) Pursuant to Rule 603(A)(4)(ii) of the RCAP, the permit holder must keep records of all required sampling data and support information for 5 years from the date of the sampling, measurement, report or sampling application. This includes a record of the fuel sampling results, monthly reports of fuel consumption and sulfur content for the burned fuels.
- (iv) Pursuant to Rule 410(F) of the RCAP, the permit holder, during the first 15 days for the month following the reported month, must submit a monthly report indicating the fuel consumption and the percent sulfur content by weight of the burned fuels for each unit.

c. Visible Emissions Limit

- (i) The permit holder shall not exceed the 20% opacity limit in a six-minute average. However, pursuant to Rule 403 (A) of the RCAP, it may discharge visible emissions of opacity of up to 60% for a period of no more than 4 minutes in any consecutive 30-minute interval.
- (ii) Lilly shall hire an independent opacity reader, certified by an institution endorsed by the EPA to perform an opacity reading for each boiler's stack during the first year of the permit using Method 9 of 40 CFR part 60, Appendix A. The Method 9 inspection must determine average opacity in a total of 24 observations within a six-minute period. Boilers must be in operation at the time of the opacity reading.
- (iii) A sampling protocol shall be submitted to the EQB at least thirty (30) days prior to the start of the test for approval. This protocol must include the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP).
- (iv) At least fifteen (15) days prior written notification of any sampling, shall be provided to the Board, to afford the EQB the opportunity to have an observer present. [Rule 106 (D) of the RCAP]
- (v) Two copies of the results of the sampling report shall be submitted within sixty (60) days of the test. This report will include the information required by Rule 106 (E) of the RCAP.
- (vi) Lilly shall perform weekly visual opacity inspections during the daytime using an Internal Visible Emissions Reader certified by a program endorsed by the EPA or the Board. If the certified reader establishes that there is excess of visible emission, Lilly will verify that the equipment causative of the above mentioned emission is operating in accordance with the manufacturer specifications and the permit conditions. Lilly will take the corrective necessary actions to eliminate the excess of visible emission in accordance to the Rules 403(A)(1) and (2) of the RCCA.
- (vii) In compliance with Rule 603(A)(4)(ii) of the RCAP, Lilly shall retain a copy of the visible emission readings report including the date and time of the readings, for a period of at least five years.

- (viii) Lilly must submit a summary of the visible emissions reports in the annual certification of compliance corresponding to the year in which the readings took place. The summary must include the opacity reading's date performed by an independent opacity reader. Also the summary must include the total number of weekly inspections performed during the year.
- (ix) The Board reserves the right to require additional visible emission readings in order to demonstrate compliance with the opacity limit.

d. Particulate Matter Emission Limit

- (i) The permit holder shall not cause or permit the emission, from any fuel burning equipment burning solid or liquid fuel, of particulate matter in excess of 0.3 lb/MMBtu of heat input. [Rule 406 of the RCAP].
- (ii) To determine compliance with the above condition Lilly shall calculate the PM emissions using the emission factors that apply to the unit and the average rate of fuel heat input as established in Table 1.3-1 of AP-42 (140,000 Btu/gal for Light Fuel Oil).
- (iii) Total heat input shall be the product of the sum of the heat content of fuels whose combustion products pass through a stack. Total heat input for all fuel burning units in a source shall be used to determine the maximum allowable amount of particulate matter to be emitted.

e. Performance Tests

- (i) Lilly shall complete the applicable performance tests on these boilers to show compliance with the standard established in 40 CFR, Part 60, Subpart Dc. Performance tests shall be conducted using EPA approved methods. [PFE-16-0203-0187-I-II-C]
- (ii) Lilly shall submit a performance test protocol at least 30 days prior to the start of the test for the Board's approval. The protocol must include, but not be limited to, the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP) and any other information the Board deems relevant. [PFE-16-0203-0187-I-II-C]
- (iii) Lilly shall provide written notification to the Board at least 15 days prior to the tests, to afford the Board the opportunity to have an observer

present. The results of performance tests that have not been observed by the Board shall not be accepted. [PFE-16-0203-0187-I-II-C]

- (iv) Lilly shall submit two copies of the sampling result reports within 60 days alter the performance of the tests, pursuant to Rule 106(E) of the RCAP. [PFE-16-0203-0187-I-II-C]
- (v) The SO₂ performance test shall consist of the fuel supplier certification as described in 40 CFR 60.48c(f).
- (vi) The opacity performance test shall be carried out following the requirements established in 40 CFR 60.11.

f. Additional Notification Requirements

- (i) Lilly shall provide an initial notification indicating the boilers starting operations date. The notification must be sent by mail within fifteen (15) days after the start of operations and shall include the information required in Sections 60.48c(a)(1) to 60.48c(a)(4) of 40 CFR.

7. EU – GT500EMGEN-3

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
Fuel consumption	No 2	See table below	Gals/yr	Fuel consumption based on hours of operation	Monthly	Record of hours of operation and fuel consumption calculation	Annually
SO ₂ Emission Limit	Sulfur content	# 0.05	Percent by weight	Analysis by supplier	Certification by fuel supplier	Every time fuel is received	Monthly
Visible emissions limit	Visible emissions	20	Six minute averaging percent	Method 9	Once during the first year of the permit	With every reading	Sixty days from the day of the reading.
				Visible emissions	Weekly	Keep records	Annually

a. Fuel Consumption

- (i) The fuel consumption limit allowed (in gallons per year) for this unit shall be determined according to the following equation:

If combined boiler consumption (EU – NSPSBOILERS) is...	Then the fuel consumption limit allowed for the generators is...
≤ 4,450,000	$220,339 + \frac{(4,409,999 - \text{fuel used in boilers}) \times 33.482}{1,000}$
> 4,450,000 y < 4,504,519	$\frac{(4,504,519 - \text{fuel used in boilers}) \times 4016.97}{1,000}$

- (ii) The permit holder may install flow meters to determine consumption. If it does, the flow meters shall be calibrated every six months or following the manufacturer’s recommendations.
- (iii) Monthly fuel consumption shall be determined using any of the following methods:

Method	Type of Record
Fuel Flow Meters	<ul style="list-style-type: none"> • Monthly fuel consumption record • Record of flow meter calibrations
Hours of Operation	<ul style="list-style-type: none"> • Record of the monthly operating hours to determine consumption • Evidence of manufacturer specifications of consumption per hour for each equipment

b. Sulfur Emission Limit

- (i) The sulfur content of oxidized liquid fuel shall not exceed 0.05%. [PFE-16-0203-0187-I-II-C]
- (ii) To comply with the requirement to maintain a daily record of the sulfur content of burned fuel, the permit holder shall retain a supplier-certified copy indicating the sulfur content of the fuel. The permit holder shall obtain a sulfur content analysis with each fuel delivery using Method ASTM 4294, ASTM 2880-71 or any other equivalent method approved by the EQB or the EPA.
- (iii) Pursuant to Rule 603(A)(4)(ii) of the RCAP, the permit holder must keep records of all required sampling data and support information for 5 years from the date of the sampling, measurement, report or sampling

application. This includes a record of the fuel sampling results, monthly reports of fuel consumption and sulfur content for the burned fuels.

- (iv) Pursuant to Rule 410(F) of the RCAP, the permit holder, during the first 15 days for the month following the reported month, must submit a monthly report indicating the fuel consumption and the percent sulfur content by weight of the burned fuels for each unit.

c. Visible Emissions Limit

- (i) The permit holder shall not exceed the 20% opacity limit in a six-minute average. However, pursuant to Rule 403 (A) of the RCAP, it may discharge visible emissions of opacity of up to 60% for a period of no more than 4 minutes in any consecutive 30-minute interval.
- (ii) Lilly shall hire an independent opacity reader, certified by an institution endorsed by the EPA to perform an opacity reading for each generator's stack during the first year of the permit using Method 9 of 40 CFR part 60, Appendix A. The Method 9 inspection must determine average opacity in a total of 24 observations within a six-minute period. Generators must be in operation at the time of the opacity reading.
- (iii) A sampling protocol shall be submitted to the EQB at least thirty (30) days prior to the start of the test for approval. This protocol must include the information described in Rule 106(C) of the Regulations for the Control of Atmospheric Pollution (RCAP).
- (iv) At least fifteen (15) days prior written notification of any sampling, shall be provided to the Board, to afford the EQB the opportunity to have an observer present. [Rule 106 (D) of the RCAP]
- (v) Two copies of the results of the sampling report shall be submitted within sixty (60) days of the test. This report will include the information required by Rule 106 (E) of the RCAP.
- (vi) Lilly shall perform weekly visual opacity inspections during the daytime using an Internal Visible Emissions Reader certified by a program endorsed by the EPA or the Board. If the certified reader establishes that there is excess of visible emission, Lilly will verify that the equipment causative of the above mentioned emission is operating in accordance with the manufacturer specifications and the permit conditions. Lilly will take

the corrective necessary actions to eliminate the excess of visible emission in accordance to the Rules 403(A)(1) and (2) of the RCCA.

- (vii) In compliance with Rule 603(A)(4)(ii) of the RCAP, Lilly shall retain a copy of the visible emission readings report including the date and time of the readings, for a period of at least five years.
- (viii) Lilly must submit a summary of the visible emissions reports in the annual certification of compliance corresponding to the year in which the readings took place. The summary must include the opacity reading's date performed by an independent opacity reader. Also the summary must include the total number of weekly inspections performed during the year.
- (ix) The Board reserves the right to require additional visible emission readings in order to demonstrate compliance with the opacity limit.

8. EU – AMMONIAUNITS

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
Ammonia emission control requirements	Use control equipment to retain 99% of emissions	N / A	N / A	Operate control equipment following manufacturer specifications	Daily while in operation	Record of parameters	Annually (<u>Certification of Compliance</u>)

a. Control Equipment Requirements (state enforceable condition)

- (i) Lilly shall operate the ammonia gas scrubber in a manner that is consistent with manufacturer design and specifications so that it shall maintain its 99% efficiency.
- (ii) The permit holder shall monitor the pH of the solution exiting the gas scrubber at least once every 24 hours while the emission unit is in operation.
- (iii) The permit holder shall make sure that the pH of the solution is less or equal to 1.0.
- (iv) The permit holder shall calibrate the pH monitor at least once every six months and shall keep the calibration records for five years.

9. EU – DUSTUNITS

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
PM Emission Limit	PM	0.05	Lbs emitted / Lbs of uncontrolled emissions	Operate control equipment following manufacturer specifications	See table below	Equipment preventive maintenance record	Annually (<u>Certification of Compliance</u>)

a. Requirements for Non-process Sources

- (i) Pursuant to Rule 409 of the RCAP, no person shall cause or permit the emission of particulate matter, at any time, in excess of 0.05 pounds per pound of uncontrolled emissions from any non-process source.
- (ii) The permit holder shall comply with the requirements established in the table below to control particulate matter emissions according to the control equipment being used.

Emission Unit	Primary Control Equipment	Efficiency of Control Equipment	Alternative Control Equipment	Efficiency of Alternative Control Equipment	Compliance Method	Methods Frequency
Described in Attachment 1	Dust collector	≥ 95%	HEPA filter	≥ 99%	Examine compartments to ensure bags are in good condition	Quarterly
					Or install, operate and calibrate pressure drop gages.	Biannually
					Or inspect the <u>control equipment exhaust with a particulate detector calibrated according to manufacturer recommendations</u>	As per manufacturer recommendations
	Filters (not HEPA)				Visual inspections of dust collectors discharge points	Monthly

	HEPA Filters	≥ 99%	Dust Collector	≥ 99%	Filter certification	Annually
					Visual inspections of dust collectors discharge points	Monthly
	Gas scrubber	≥ 95%	-----	N/A	Monitoring of solution exiting the gas scrubber	Daily while in operation

10. EU – VOCUNITS-1

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
VOC emission limit	VOC emissions	> 3	Lbs / hr	Operate control equipment following manufacturer specifications	See table below	Preventive maintenance activities	<u>Annually</u> (<u>Certification of Compliance</u>)
		> 15	Lbs / day				

a. Requirements for sources emitting VOC (state enforceable condition)

- (i) According to Rule 419(A), no person shall cause or permit the emission of more than 1.36 Kg (3 pounds) of volatile organic compounds in any one hour, or more than 6.8 Kg (15 pounds) per day from any item, machine, equipment or any other device unless said equipment is provided with an acceptable control system, pollution prevention and reductions mechanism or program or both, as approved or required by the Board.
- (ii) According to Rule 419(E), the emissions of organic solvents resulting from clean-up with organic solvents shall be taken into consideration together with other organic solvent emissions from the items, machines, equipment or other devices in order to determine compliance with this rule.
- (iii) The permit holder shall comply with the requirements established in the table below to control volatile organic compound emissions according to the control equipment being used.

Emission Unit	Primary Control Equipment	Alternative Control Equipment	Efficiency of Control Equipment	Compliance Method	Frequency
T-35, T-37	Condenser	Carbon absorber	≥ 90%	Preventive maintenance	Quarterly
			≥ 90%	Monitoring of performance parameters: <ul style="list-style-type: none"> • Temperature of the beds during the absorption and regeneration cycles. • Air flow during the absorption and regeneration cycles. 	At least once before 30 minutes have elapsed once the emission unit has begun operations and every three hours while the unit is in operation.
EV-33, DR-60	Carbon absorber	Carbon absorber	≥ 90%	Monitoring of performance parameters: <ul style="list-style-type: none"> • Temperature of the beds during the absorption and regeneration cycles • Air flow during the absorption and regeneration cycles 	At least once before 30 minutes have elapsed once the emission unit has begun operations and every three hours while the unit is in operation.
			Condenser	≥ 90%	Preventive maintenance

11. EU – VOCUNITS-2

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
VOC emission limit	VOC emissions	< 3	Lbs / hr	Calculation of emissions	Initially and reevaluate every year.	Record of the results of the calculations	Annually (<u>Certification of Compliance</u>)
		< 15	Lbs / day				

a. Requirements for Sources that Emit VOC (state enforceable condition)

- (i) The permit holder shall keep records of the emissions calculations to show that the emissions for these activities (including clean-up with organic solvents) do not reach the de 3 lbs/hr, or 15 lbs/day limits, and therefore are not required to comply with Rule 419 of the RCAP.

12. EU – TANKS

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
VOC emission limit	VOC emissions	< 40,000	Gallons	Install and operate the control equipment in a efficient manner	While the unit is in operation	Preventive maintenance activities	Annually (<u>Certification of Compliance</u>)

a. Requirements for Tanks Emitting VOC (state enforceable condition)

- (i) According to rule 419(F)(6), the permit holder shall install conservation vents, a flame arrestor or any other type of equipment whose emissions control effect is equivalent to these for any VOC storage tank with a capacity of less than 40,000 gallons in order to be exempted from said rule.
- (ii) The permit holder shall install and operate a condenser fan, following manufacturer specifications in tanks TK-8490, TK-8500, TK-8510, TK-8560. [PFE-16-0203-0187-I-II-C]
- (iii) The permit holder shall provide preventive maintenance to the control equipment at least once per year. [PFE-16-0203-0187-I-II-C]

13. EU – HCLTNK

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
HAP emission limit	N / A	N / A	N / A	Monitoring of operation parameters	Daily while the source is in operation	Record of parameters	Annually (<u>Certification of Compliance</u>)

a. Requirements of tanks processing HCl

- (i) The permit holder shall install and operate a gas scrubber following manufacturer specifications to meet 90% equipment efficiency.
- (ii) The permit holder shall monitor the pH of the solution exiting from the gas scrubber at least once every 24 hours while the emission unit is in operation.

- (iii) The permit holder shall make sure that the pH of the solution is more than or equal to 6.0.
- (iv) The permit holder shall calibrate the pH monitor at least once every six months and shall keep the calibration records for five years.
- (v) The permit holder shall operate an alternative gas scrubber in case the primary gas scrubber cannot be used.
- (vi) The permit holder shall replace the resin of the alternative gas scrubber following manufacturer recommendations.
- (vii) The permit holder shall keep a record indicating the time and date the alternative gas scrubber is in operation.

B. PR05 Operational Requirements

1. EU – FERMENTATION

Condition	Parameter	Value	Units	Compliance Method	Method Frequency	Recordkeeping Requirements	Reporting Frequency
H ₂ S Emissions limit	Ground level concentration	0.1	ppm / hr	Monitoring to insure no objectionable odors are produced	Daily while the source is in operation	Keep record of deviations	Annually <u>(Certification of Compliance)</u>
		0.03	ppm / día				

a. Process Requirements (state enforceable condition)

- (i) Pursuant to Rule 411 of the RCCA, no person shall cause or permit the burning of Hydrogen Sulfide (H₂S), which would cause ground level concentrations equal to or greater than 0.1 ppm in any one hour period or a 0.03 ppm mathematical average in any 24-hour period.
- (ii) To show compliance with the above condition, no permit holder shall cause or permit the emission to the atmosphere of matter that produces objectionable or disagreeable odors that can be perceived in an area other than that designated for industrial purposes.

2. EU – VOCEMISSIONS

a. Fugitive Emission Requirements

- (i) Lilly must implement a Leak Detection and Repair Program consistent with the standards of Pharmaceutical Maximum Achievable Control Technology standards at 40 CFR 63 Subpart GGG to control and minimize VOC fugitive emissions except for the reporting provisions which will be required pursuant to Puerto Rico's Rule 603.. [November 3, 2005 – PSD Non Applicability Determination clarification]
- (ii) As part of the PR05 Leak Detection and Repair Program Lilly shall keep the necessary records according to the requirements of the National Emission Standards for Pharmaceuticals Production (specified in 40 CFR, Part 63.1255(g)). [PFE-16-0203-0187-I-II-C]
- (iii) Lilly must ensure that the pipes serving pure VOC's at the PR05 Plant site will have welded connections where design, operational quality, safety, and maintenance requirements allow such connections. Pumps servicing pure VOC's at the PR05 Plant site will be sealless (e.g., diaphragm pumps) or of leakless technology (e.g., double mechanical seals). All the pumps, pipes and other components carrying VOC's which are not pure will, however, be subject to other LDAR provisions. [November 3, 2005 – PSD Non Applicability Determination clarification]

b. Storage Tank Requirements

- (i) Lilly must install vent condensers to control VOC emissions from the solvent storage tanks, TK-8490, TK-8500, TK-8510 and TK-8560 as well as the Solvent Recovery Unit to reduce the aggregate of uncontrolled VOC emissions entering these units by 82%. A vent condenser is not required on a waste storage tank TK-8470, however, Lilly must employ work practices that minimize emissions from this tank. Lilly must operate and maintain the condensers in accordance with the vendor's instructions and Operating and Maintenance Manuals. [November 3, 2005 – PSD Non Applicability Determination clarification]

Section VI – Insignificant Emission Units

The following activities shall be considered insignificant as long as the permit holder complies with the description indicated below.

Emission Unit ID	Description
Material transfer process # 1 VP-1	Emits less than 2 tons/yr of PM (Appendix B, Subpart 3, ii, P).
Material transfer process # 2 VP-2	Appendix B, Subpart 3, ii, P
Material transfer process # 3 VP-3	Appendix B, Subpart 3, ii, P
Material transfer process # 4 VP-4	Appendix B, Subpart 3, ii, P
Material transfer process # 5 VP-5	Appendix B, Subpart 3, ii, P
Material transfer process # 6 VP-6	Appendix B, Subpart 3, ii, P
Material transfer process # 7 VP-7	Appendix B, Subpart 3, ii, P
Mixing/Blending and Material Transfer MX-250	Appendix B, Subpart 3, ii, P
Mixing/Blending and Material Transfer MX-135	Appendix B, Subpart 3, ii, P
Dispensing and Material Transfer Process # 1 DP-1	Appendix B, Subpart 3, ii, P
Dispensing and Material Transfer Process # 2 DP-2	Appendix B, Subpart 3, ii, P
Dispensing and Material Transfer Process # 3 DP-3	Appendix B, Subpart 3, ii, P
Dispensing and Material Transfer Process # 4 DP-4	Appendix B, Subpart 3, ii, P
	Emits less than 2 tons/yr of PM (Appendix B,

Emission Unit ID	Description
Dispensing and Material Transfer Process # 5 DP-5	Subpart 3, ii, P).
Dispensing and Material Transfer Process # 6 DP-6	Appendix B, Subpart 3, ii, P
Granulation/Drying and Material Transfer Process # 1 GDP-1	Appendix B, Subpart 3, ii, P
Granulation/Drying and Material Transfer Process # 2 GDP-2	Appendix B, Subpart 3, ii, P
Granulation/Drying and Material Transfer Process # 3 GDP-3	Appendix B, Subpart 3, ii, P
Granulation/Drying and Material Transfer Process # 4 GDP-4	Appendix B, Subpart 3, ii, P
Table Compressing and Unit Cleaning Activity # 1 CP-1	Emits less than 1 ton/yr of PM ₁₀ (Appendix B, Subpart 3, ii, P).
Table Compressing and Unit Cleaning Activity # 2 CP-2	Appendix B, Subpart 3, ii, P
Table Compressing and Unit Cleaning Activity # 3 CP-3	Appendix B, Subpart 3, ii, P
Table Compressing and Unit Cleaning Activity # 4 CP-4	Appendix B, Subpart 3, ii, P
Table Compressing and Unit Cleaning	Emits less than 1 ton/yr of PM ₁₀ (Appendix B,

Emission Unit ID	Description
Activity # 5 CP-5	Subpart 3, ii, P).
Dispensing for Pilot Plant Operations MT-PP-1	Appendix B, Subpart 3, ii, P
Material Transfer for Pilot Plant Operations DP-PP-1	Appendix B, Subpart 3, ii, P
Granulation / Coating / Drying for Pilot Plant Operations GC-PP-1	Appendix B, Subpart 3, ii, P
Tablet Coating Process #1 CTP-1	Appendix B, Subpart 3, ii, P
Tablet Coating Process #2 CTP-2	Appendix B, Subpart 3, ii, P
Tablet Coating Process #3 CTP-3	Appendix B, Subpart 3, ii, P
Tablet Coating Process #4 CTP-4	Appendix B, Subpart 3, ii, P
Tablet Coating Process #5 CTP-5	Appendix B, Subpart 3, ii, P
Tablet Coating Process #6 CTP-6	Appendix B, Subpart 3, ii, P
Tablet Coating Process #7 CTP-7	Appendix B, Subpart 3, ii, P
Capsule Filling Process #1 CF-1	Appendix B, Subpart 3, ii, P
Capsule Filling Process #2 CF-2	Emits less than 1 ton/yr de PM ₁₀ (Appendix B, Subpart 3, ii, P).

Emission Unit ID	Description
Capsule Filling Process #3 CF-3	Appendix B, Subpart 3, ii, P
Capsule Filling Process #4 CF-4	Appendix B, Subpart 3, ii, P
Capsule Filling Process #5 CF-5	Appendix B, Subpart 3, ii, P
Capsule Filling Process #6 CF-6	Appendix B, Subpart 3, ii, P
Capsule Filling Process #7 CF-7	Appendix B, Subpart 3, ii, P
Capsule Filling Process #8 CF-8	Appendix B, Subpart 3, ii, P
Material Transfer/Solution Preparation Activities SPA-1	Appendix B, Subpart 3, ii, P
Equipment Cleaning Area PD-1	Emits less than 1 ton/yr VOC (Appendix B, Subpart 3, ii, P).
Tablet Printing Process #1 TPP-1	Appendix B, Subpart 3, ii, P
Tablet Printing Process #2 TPP-2	Appendix B, Subpart 3, ii, P
Tablet Printing Process #3 TPP-3	Appendix B, Subpart 3, ii, P
Emergency Generator 510A	Operating Scenario equal to or less than 500 hrs/yr (Appendix B, Subpart 3, ii, O)
Emergency Generator 510B	Operating Scenario equal to or less than 500 hrs/yr (Appendix B, Subpart 3, ii, O)

Emission Unit ID	Description
Emergency Generator 510C	Appendix B, Subpart 3, ii, O
Emergency Generator 510D	Appendix B, Subpart 3, ii, O
Emergency Generator 510E	Appendix B, Subpart 3, ii, O
Emergency Generator 510F	Appendix B, Subpart 3, ii, O
Hydrochloric Acid Storage Tank T-405A	Storage tanks with capacity of less than 10,000 gallons (Appendix B, Subpart 3, ii, N)
Fuel Storage Tank STK-KERO	Aboveground storage tanks for gasoline, diesel fuel and kerosene with capacity of less than 10,000 gallons (Appendix B, Subpart 3, xi).
Fuel Storage Tank T-601	Emits less than 1 ton/yr of VOC (Appendix B, Subpart 3, ii, P)
Fuel Storage Tank T-602	Appendix B, Subpart 3, ii, P
Fuel Storage Tank T-603	Appendix B, Subpart 3, ii, P
Fuel Storage Tank T-604	Appendix B, Subpart 3, ii, P
Fuel Storage Tank T-605	Appendix B, Subpart 3, ii, P
Ammonia Storage Tank T-113A	Storage tanks with capacity of less than 10,000 gallons (Appendix B, Subpart 3, ii, N)
Ammonia Storage Tank T-23	Storage tanks with capacity of less than 10,000 gallons (Appendix B, Subpart 3, ii, N)

Emission Unit ID	Description
Storage Tank for recovered ammonia T-50	Appendix B, Subpart 3, ii, N
Liquid VOC Storage Tank T-301	Emits less than 1 ton/yr of VOC (Appendix B, Subpart 3, ii, P)
Liquid VOC Storage Tank T-30	Appendix B, Subpart 3, ii, P
Liquid VOC Storage Tank T-32	Appendix B, Subpart 3, ii, P
Liquid VOC Storage Tank T-34	Appendix B, Subpart 3, ii, P
Liquid VOC Storage Tank T-36	Appendix B, Subpart 3, ii, P
Liquid VOC Storage Tank T-38	Appendix B, Subpart 3, ii, P
Liquid VOC Recovery Process EV-31	Storage tanks with capacity of less than 10,000 gallons (Appendix B, Subpart 3, ii, N)
Raw Material Weighting / Dispensing Processes FT-4	Emits less than 1 ton/yr of PM ₁₀ (Appendix B, Subpart 3, ii, P).
Milling Process MP-1	Appendix B, Subpart 3, ii, P
Drum Rolling (Blending Process) BP-1	Appendix B, Subpart 3, ii, P
Fuel Storage Tank T-503	Emits less than 1 ton/yr of VOC (Appendix B, Subpart 3, ii, P)
Fuel Storage Tank T-504	Emits less than 1 ton/yr of VOC (Appendix B, Subpart 3, ii, P)

Emission Unit ID	Description
Fuel Storage Tank T-505	Appendix B, Subpart 3, ii, P
Fuel Storage Tank DTK-HFO	Appendix B, Subpart 3, ii, P
Process Tank for Storing VOC T-217A	Appendix B, Subpart 3, ii, P
Process Tank for Storing VOC T-217G	Appendix B, Subpart 3, ii, P
Regeneration Solution Preparation, Elution Solution Preparation, and Storage C-204, T-205, T-151, T-152	Appendix B, Subpart 3, ii, P
Solvents Storage I-DRUMS	Appendix B, Subpart 3, ii, P
Fuel Storage Tank T-3M-A	Appendix B, Subpart 3, ii, P
Fuel Storage Tank T-3M-B	Appendix B, Subpart 3, ii, P
Emergency Generator 3M-A	Operating scenario equal to or less than 500 hrs/yr (Appendix B, Subpart 3, ii, O)
Emergency Generator 511B	Appendix B, Subpart 3, ii, O
Emergency Generator 511C	Appendix B, Subpart 3, ii, O
Liquid VOC Storage Tank T-901	Emits less than 1 ton/yr of VOC (Appendix B, Subpart 3, ii, P)
Liquid VOC Storage Tank T-902	Emits less than 1 ton/yr of VOC (Appendix B, Subpart 3, ii, P)

Emission Unit ID	Description
Liquid VOC Storage Tank T-902A	Appendix B, Subpart 3, ii, P
Liquid VOC Storage Tank T-902B	Appendix B, Subpart 3, ii, P
Liquid VOC Storage Tank T-903	Appendix B, Subpart 3, ii, P
Liquid VOC Underground Storage Tank I-SMP	Appendix B, Subpart 3, ii, P
Storage Tank for Generator Fuel	Storage tanks with capacity of less than 10,000 gallons (Appendix B, Subpart 3, ii, N)
Interior and exterior activities including roof painting and repair	Appendix B, Subpart 3, ii, I
Maintenance shop activities such as brazing, welding, soldering equipment	Appendix B, Subpart 3, ii, E
Food preparation in cafeterias and dining rooms	Appendix B, Subpart 3, ii, J
Water treatment equipment	Appendix B, Subpart 3, ii, L
Pilot plants and laboratories which engage in research development and quality control activities	Appendix B, Subpart 3, ii, M
The engine of any vehicle, including tractors, forklifts, or mobile construction equipment	Appendix B, Subpart 3, iii
Internal combustion engines with capacity of less than 50 hp and operation rate equal to or less than 500 hrs/yr and compressors driven by internal combustion and used for emergency replacement or stand-by service	Appendix B, Subpart 3, vi
Small combustion sources with a heat input capacity of less than 1.0 MM BTU/hr.	Appendix B, Subpart 3, vii

Emission Unit ID	Description
Sand blasting operations in enclosed or outside areas, satisfying conditions regarding particulate and fugitive emissions	Appendix B, Subpart 3, viii
Research trials that will last 30 days or less and which will result in VOC emissions of less than 3 lbs/hr or 15 lbs/day	Appendix B, Subpart 3, ix
Commercial laundries (except dry cleaners) not using liquid or solid fuel	Appendix B, Subpart 3, xiii
Space heaters operating by direct heat or radiant heat transfer or both	Appendix B, Subpart 3, xvii
Maintenance and repair activities of buildings and structures of the facility, including repainting, reroofing, and sandblasting, where no structural repairs are made in conjunction with the installation of new or permanent facilities	Appendix B, Subpart 3, xviii
Safety devices	Appendix B, Subpart 3, xix
Air pollution detectors and test equipment	Appendix B, Subpart 3, xx
Environmental Laboratory	Appendix B, Subpart 3, xxi
Non-routine cleanout of tanks and equipment for purposes of worker entry or in preparation for maintenance or decommissioning	Appendix B, Subpart 3, xxvi
Equipment for steam cleaning or brushing dust off equipment	Appendix B, Subpart 3, xxx
Process raw water treatment	Appendix B, Subpart 3, xxxii
Water cooling tower, except for systems including contact with process water or water treated with chromium based chemicals	Appendix B, Subpart 3, xxxiii
Spill collection tanks	Appendix B, Subpart 3, xxxiv
Steam vents and leaks from boilers and steam distribution systems	Appendix B, Subpart 3, xxxv
Boiler water treatment operations, except	Appendix B, Subpart 3, xxxvi

Emission Unit ID	Description
those involving use of hydrazide	
Portable or mobile containers	Appendix B, Subpart 3, xxxviii
Control panel and electric engine vents or gas exhaust systems	Appendix B, Subpart 3, xxxix
Pump seals	Appendix B, Subpart 3, xxxxi
Storage of substances in closed drums, barrels or bottles	Appendix B, Subpart 3, xxxxiv
Obturating, chopping, adjusting or cutting, perforating, repacking and inspecting jointly with plastics manufacturing processes.	Appendix B, Subpart 3, xxxvii

Section VII – Permit Shield

- A. Pursuant to Rule 603(d) of the RCAP, compliance with the conditions of the permit shall be deemed compliance with any applicable requirement as of the date of permit issuance, provided that such applicable requirement is specifically identified in the permit. Likewise, it shall be deemed in compliance with any requirement specifically identified as Not Applicable in the permit.

1. Plantwide Non Applicable Requirements

NON APPLICABLE REQUIREMENTS		
FEDERAL	STATE	REASON FOR NON-APPLICABILITY
	Rule 105 of the RCAP	This Rule does not apply to Major Sources Permits (Title V)
	Rule 204 of the RCAP	Pursuant to Rule 204(A)(4), all emission sources that submit a Title V permit application will be exempt from the permit requirements established under this Rule.
	Rule 407 of the RCAP	The facility does not operate process sources as defined in Rule 102 of the RCAP.
	<u>Rule 412 of the RCAP</u>	<u>SO₂ emissions are cover under Rule 410 of the RCAP.</u>
40 CFR Part 60, Subpart K		The facility does not operate any volatile organic liquid storage tanks whose construction, reconstruction or modification commenced after June 11, 1973 and prior to May 19, 1978.
40 CFR Part 60, Subpart Ka		The facility does not operate any petroleum liquids storage tank whose construction, reconstruction or modification commenced after May 18, 1978 and prior to July 23, 1984.

NON APPLICABLE REQUIREMENTS		
FEDERAL	STATE	REASON FOR NON-APPLICABILITY
40 CFR Part 60, Subpart Kb		Tanks with storage capacity of 10,566 to 19,811 gallons, tanks with capacity of 19,812 to 39,888 gallons containing volatile organic liquids with steam pressure less than 2.2 psia, and tanks with capacity of more than 39,889 gallons containing volatile organic liquids with steam pressure less than 0.5 psia are exempt from this section even if they were constructed, reconstructed or modified after July 12, 1984.
40 CFR Part 60, Subpart RRR		The facility does not produce any of the chemicals contemplated in the list in section 60.707.
40 CFR Part 61, Subpart FF		The facility does not perform operations that produce benzene waste
40 CFR Part 63, Subpart B		The facility is not a major source for HAP's and none is close to the limit.
40 CFR Part 63, Subpart F		The facility does not manufacture any of the compounds in the list in Table 1 of this section.
40 CFR Part 63, Subpart G		The facility does not manufacture or use any of the compounds in the list in Table 1 or the HAPs in Table 2 of this section.
40 CFR Part 63, Subparts H e I		The facility does not use methylene chloride or carbon tetrachloride as component in its manufacturing operations.

NON APPLICABLE REQUIREMENTS		
FEDERAL	STATE	REASON FOR NON-APPLICABILITY
40 CFR Part 63, Subpart Q		The facility does not use chromium bases to treat the waters in the cooling towers.
40 CFR Part 63, Subpart T		The facility does not use halogenated solvents in its cleaning operations.
40 CFR Part 60, Subpart NNN		The facility does not produce any of the chemicals contemplated in the list in section 60.707.
40 CFR Part 63, Subpart GGG		The facility does not has the potential to emit 10 tons per year of one HAP or 25 tons per year of combined HAP

2. Emission Units Non Applicable Requirements

a) EU-HFOBOILER-1, EU-HFOBOILER-2

<u>NON APPLICABLE REQUIREMENTS</u>		
<u>FEDERAL</u>	<u>STATE</u>	<u>REASON FOR NON-APPLICABILITY</u>
<u>40 CFR Part 60, Subpart D</u>		<u>Neither of these equipment has a heat input capacity greater than 250 MMBtu/hr</u>
<u>40 CFR Part 60, Subpart Da</u>		<u>Neither of these equipment has a heat input capacity greater than 250 MMBtu/hr</u>
<u>40 CFR Part 60, Subpart Db</u>		<u>Neither of these equipment has a heat input capacity greater than 100 MMBtu/hr</u>
<u>40 CFR Part 60, Subpart Dc</u>		<u>Although all these equipment has a heat input capacity between 10 and 100 MMBtu/hr were constructed before June 9, 1989</u>

b) **EU-GT500EMGEN-4, EU-GT500EMGEN-2, EU-GT500EMGEN-3**

<u>NON APPLICABLE REQUIREMENTS</u>		
<u>FEDERAL</u>	<u>STATE</u>	<u>REASON FOR NON-APPLICABILITY</u>
	<u>Rule 406 of the RCAP</u>	<u>These electric generators are not fuel burning equipment as defined in Rule 102 of the RCAP</u>
	<u>Rule 410 of the RCAP</u>	<u>These electric generators are not fuel burning equipment as defined in Rule 102 of the RCAP</u>

c) **EU-DUSTUNITS**

<u>NON APPLICABLE REQUIREMENTS</u>		
<u>FEDERAL</u>	<u>STATE</u>	<u>REASON FOR NON-APPLICABILITY</u>
	<u>Rule 403 of the RCAP</u>	<u>These equipments does not produced visible emissions</u>
	<u>Rule 407 of the RCAP</u>	<u>These units are not process sources as defined in Rule 102 of the RCAP</u>

d) **EU-VOCUNITS-1, EU-VOCUNITS-2, EU-TANKS**

<u>NON APPLICABLE REQUIREMENTS</u>		
<u>FEDERAL</u>	<u>STATE</u>	<u>REASON FOR NON-APPLICABILITY</u>
	<u>Rule 417 of the RCAP</u>	<u>Neither of these tanks has a capacity greater than 40,000 gallons</u>

e) **EU-VOCUNITS-2, EU-TANKS**

<u>NON APPLICABLE REQUIREMENTS</u>		
<u>FEDERAL</u>	<u>STATE</u>	<u>REASON FOR NON-APPLICABILITY</u>
	<u>Rule 419 of the RCAP</u>	<u>EU-VOCUNITS emissions are less than 3 pounds/hr or 15 pounds/day of VOC's. All units in EU-TANKS has a capacity less than 40,000 gallons</u>

Section VIII – Permit Approval

Pursuant to the powers granted to the Environmental Quality Board by the Environmental Public Policy Act, Public Law Number 416 of September 22, 2004, and after verifying the administrative record and in compliance with the Uniform Administrative Procedures Act, Public Law Number 170 of August 12, 1998, as amended, the US Clean Air Act, the Puerto Rico Environmental Public Policy Act and the Environmental Quality Board Regulations for the Control of Atmospheric Pollution, the Environmental Quality Board approves the permit and the terms and conditions stipulated therein.

In San Juan, Puerto Rico, today March 31, 2006.

ENVIRONMENTAL QUALITY BOARD

/s/
Eugene Scott Amy
Vice President

/s/
Julio I. Rodríguez Colón
Alternate Member

/s/
Carlos W. López Freytes
President

APPENDICES

APPENDIX I

Appendix I - Definitions and Abbreviations

A. Definitions:

1. Act - US Clean Air Act, as amended, 42 U.S. 7401, *et seq.*
2. Responsible Official - See definition for Responsible Official as established in the Environmental Quality Board Regulations for the Control of Atmospheric Pollution (1995).
3. Regulations - Environmental Quality Board Regulations for the Control of Atmospheric Pollution.
4. Permit Holder - Person and entity to which the Puerto Rico Environmental Quality Board has issued an Emission Source Operation Permit covered under Title V.
5. Title V - Title V of the US Clean Air Act (42 U.S.C. 7661).

B. Abbreviations

1. BACT – Best Available Control Technology
2. Btu – British Thermal Unit
3. CFR – Code of Federal Regulations
4. CO – Carbon Monoxide
5. EQB – Puerto Rico Environmental Quality Board
6. EPA – US Environmental Protection Agency
7. HAP – Hazardous Air Pollutant
8. MACT – Maximum Achievable Control Technology
9. Mg – Milligrams
10. NAAQS–National Ambient Air Quality Standards
11. NECAP – National Emission Standards for Hazardous Air Pollutants
12. NO_x – Nitrogen Oxides

13. PM₁₀ – Particulate matter with a mass median aerodynamic diameter equal or less than ten (10) micrometers
14. PSD – Prevention of Significant Deterioration
15. PSNSS – Performance Standards for New Stationary Sources
16. RCAP – Environmental Quality Board Regulations for the Control of Atmospheric Pollution
17. SIC – Standard Industrial Classification
18. SO₂ – Sulfur Dioxide
19. VOC – Volatile Organic Compounds

C. Address for Notifications

Compliance and Permit Changes Notifications

Environmental Quality Board
Air Quality Area
Box 11488
Santurce, PR 00910

ATTACHMENTS

ATTACHMENT I - CONTROL EQUIPMENT

A. EU - DUSTUNITS

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT	CONTROL EQUIPMENT ID
<i>DISPENSING</i>	DP-1	Dust collector	DC-DP-1
	DP-2	Dust collector	DC-DP-2
	DP-3	Dust collector	DC-DP-3
	DP-4	Dust collector	DC-DP-2
	DP-5	Dust collector	DC-DP-5
	DP-7	Dust collector	DC-9105
	DP-SALT	Non-HEPA Filters	VF-SALT
	DP- UREA	Non-HEPA Filters	VF-UREA
	FT4	Wet Scruber	WS-1
<i>MATERIAL TRANSFER</i>	VP-1	Non-HEPA Filters	F-VP-1
	VP-2	Non-HEPA Filters	F-VP-2
	VP-3	Non-HEPA Filters	F-VP-3
	VP-4	Non-HEPA Filters	F-VP-4
	VP-5	Non-HEPA Filters	F-VP-5
	VP-6	Non-HEPA Filters	F-VP-6
	VP-7	Non-HEPA Filters	F-VP-7
<i>MIXING / BLENDING</i>	MX-250	Dust collector	DC-MX-250
	MX-135	Dust collector	DC-MX-135
<i>GRANULATION / DRYING</i>	GDP-1	HEPA Filter	HF-GDP-1
	GDP-2	HEPA Filter	HF-GDP-2
	GDP-3	HEPA Filter	HF-GDP-3
	GDP-4	HEPA Filter	HF-GDP-4
<i>COMPRESSION</i>	CP-1	Dust collector	DC-1
	CP-2	Dust collector	DC-1
	CP-3	Dust collector	DC-CP-3
	CP-4	Dust collector	DC-CP-4
	CP-5	Dust collector	DC-CP-5

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT	CONTROL EQUIPMENT ID
<i>SOLUTION PREPARATION</i>	SPA-1	Dust collector	DC-SPA-1
<i>CAPSULE FILLING</i>	CF-1	Dust collector	DC-1
	CF-2	Dust collector	DC-1
	CF-3	HEPA Filter	HF-CF-3
	CF-4	HEPA Filter	HF-CF-4
	CF-5	HEPA Filter	HF-CF-5
	CF-6	HEPA Filter	HF-CF-6
	CF-7	HEPA Filter	HF-CF-7
	CF-8	HEPA Filter	HF-CF-8
<i>COATING</i>	CTP-1	Dust collector	DC-CTP-1
	CTP-2	Dust collector	DC-CTP-2
	CTP-3	Dust collector	DC-CTP-3
	CTP-4	Dust collector	DC-CTP-4
	CTP-5	Dust collector	DC-CTP-5
	CTP-6	Dust collector	DC-CTP-6
	CTP-7	Dust collector	DC-CTP-7
<i>PILOT PLANT OPERATIONS</i>	MT-PP-1	HEPA Filter	HF-PP-1
	DP-PP-1	HEPA Filter	HF-PP-1
	GC-PP-1	Dust collector	DC-PP-1
<i>MILLING AND BLENDED</i>	MP-1	Dust collector	DC-MP-1
	BP-1	Dust collector	DC-MP-1

B. EU - TANKS

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT	CONTROL EQUIPMENT ID
<i>SOLVENT AND PROCESS WASTE STORAGE</i>	T-901	Conservation vent	CV-901
	T-902	Conservation vent	CV-902
	T-902A	Conservation vent	CV-902A
	T-902B	Conservation vent	CV-902B
	T-903	Conservation vent	CV-903
	I-SMP	Conservation vent	CV-I-SMP

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT	CONTROL EQUIPMENT ID
<i>SOLVENT AND PROCESS WASTE STORAGE</i>	I-SMP	Conservation vent	CV-I-SMP
	T-217A	Conservation vent	CV-217A
	T-217G	Conservation vent	CV-217G
	TK-8470	Conservation vent	CV-8470
	TK-8490	HEPA Filter	HE-8490
	TK-8560	HEPA Filter	HE-8560
	TK-8500	HEPA Filter	HE-8500
<i>SOLVENT RECOVERY</i>	TK-8510	HEPA Filter	HE-8510
	TK-SRU	HEPA Filter	HE-SRU

C. EU-VOCUNITS-1

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT	CONTROL EQUIPMENT ID
<i>DRYING</i>	DR-60	Carbon Adsorber	Primary: CA-1
		Condenser	Alternate: HE-DR-60
<i>EXTRACTION</i>	T-35	Condenser	HE-32
<i>CRISTALLIZATION AND FILTRATION</i>	T-37	Condenser	HE-32
<i>BATCH REPROCESSING</i>	EV-33	Carbon Adsorber	CA-1

D. EU-AMMONIAUNITS

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>ELUTION AND REGENERATION</i>	C-3	Ammonia Scrubber
	C-4	Ammonia Scrubber
	C-5	Ammonia Scrubber
	C-6	Ammonia Scrubber

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>ELUTION AND REGENERATION (CONT.)</i>	C-10	Ammonia Scrubber
	C-11	Ammonia Scrubber
	C-12	Ammonia Scrubber
	C-13	Ammonia Scrubber
	C-14	Ammonia Scrubber
	C-15	Ammonia Scrubber
	C-66	Ammonia Scrubber
<i>CONCENTRATION</i>	EV-17	Ammonia Scrubber
	EV-57	Ammonia Scrubber
	EV-16	Ammonia Scrubber
<i>AMMONIA RECOVERY</i>	ARU-1	Ammonia Scrubber
<i>AMMONIA STORAGE</i>	T-113	Ammonia Scrubber
	T-114	Ammonia Scrubber
	T-113A	Ammonia Scrubber
	T-50	Ammonia Scrubber
	T-119	Ammonia Scrubber
<i>INTERMEDIATE PRODUCT STORAGE</i>	T-56	Ammonia Scrubber
	T-104	Ammonia Scrubber
	PT-81	Ammonia Scrubber
	T-1	Ammonia Scrubber
	T-1A	Ammonia Scrubber
	T-1B	Ammonia Scrubber
	T-18	Ammonia Scrubber
	T-19	Ammonia Scrubber
	T-20	Ammonia Scrubber
	T-21	Ammonia Scrubber
	T-22	Ammonia Scrubber
	T-23	Ammonia Scrubber
	T-24	Ammonia Scrubber
T-25	Ammonia Scrubber	

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>INTERMEDIATE PRODUCT STORAGE (CONT.)</i>	T-26	Ammonia Scrubber
	T-27	Ammonia Scrubber
	T-28	Ammonia Scrubber
	T-29	Ammonia Scrubber

E. EU-HCLTNK

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT	CONTROL EQUIPMENT ID
<i>HCL STORAGE</i>	T-405A	Scrubber	Primary: SCBR-405A-1
		Scrubber	Alternate: SCBR-405A-2

F. EU-VOCUNITS-2

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>TABLET IMPRINTING</i>	TPP-1	-----
	TPP-2	-----
	TPP-3	-----
<i>COMPRESSION UNITS CLEANING</i>	CP-1	-----
	CP-2	-----
	CP-3	-----
	CP-4	-----
	CP-5	-----
<i>SOLVENT DISPENSING</i>	DP-6	-----
<i>EQUIPMENT PARTS CLEANING</i>	PD-1	-----

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>ELUTION AND REGENERATION</i>	T-151	-----
	T-152	-----
	T-205	-----
	C-204	-----
<i>CONCENTRATION</i>	EV-100	-----
<i>INTERMEDIATE PRODUCT STORAGE</i>	T-301	-----
	P-T83	-----
<i>SOLVENT RECOVERY</i>	EV-31	-----
	C-900	-----
<i>SOLVENT STORAGE</i>	T-30	-----
	T-32	-----
	T-34	-----
	T-36	-----
	T-38	-----
	I-DRUMS	-----
	TK-GLYC-A	-----
	TK-GLYC-B	-----
<i>PURIFICATION</i>	TK-3620A	-----
	TK-3620B	-----
	TK-3200A	-----
	TK-3200B	-----
	TK-3260A	-----
	TK-3260B	-----
	TK-3290A	-----
	TK-3290B	-----
	TK-3370A	-----
	TK-3370B	-----
	TK-3780A	-----
	TK-3780B	-----
	TK-3600A	-----
	TK-3600B	-----
TK-3190A	-----	
TK-3190B	-----	

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>PURIFICATION (CONT.)</i>	TK-3180A	-----
	TK-3180B	-----
	TK-3740A	-----
	TK-3740B	-----
	TK-3180A	-----
	TK-3180B	-----
	TK-3740A	-----
	TK-3740B	-----
	TK-3750A	-----
	TK-3750B	-----
	TK-3210A	-----
	TK-3210B	-----
	TK-3270A	-----
	TK-3270B	-----
	TK-3640A	-----
	TK-3640B	-----
	TK-3760A	-----
	TK-3760B	-----
	TK-3130A	-----
	TK-3130B	-----
	TK-3230A	-----
	TK-3230B	-----
	TK-3410A	-----
	TK-3410B	-----
	TK-3470A	-----
	TK-3470B	-----
	TK-3240A	-----
	TK-3240B	-----
	TK-4100A	-----
	TK-4100B	-----
TK-4110A	-----	
TK-4110B	-----	
TK-4120A	-----	

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>PURIFICATION (CONT.)</i>	TK-4120B	-----
	TK-4125A	-----
	TK-4125B	-----
	TK-4410A	-----
	TK-4410B	-----
	TK-4420A	-----
	TK-4420B	-----
	TK-4430A	-----
	TK-4430B	-----
	TK-4440A	-----
	TK-4440B	-----
	TK-4600A	-----
	TK-4600B	-----
	TK-4640A	-----
	TK-4640B	-----
	TK-5000A	-----
	TK-5000B	-----
	TK-5010A	-----
	TK-5010B	-----
	TK-5130A	-----
	TK-5130B	-----
	TK-5140A	-----
	TK-5140B	-----
	TK-5150A	-----
	TK-5150B	-----
	TK-5200A	-----
	TK-5200B	-----
	TK-5210A	-----
	TK-5210B	-----
	TK-5220A	-----
	TK-5220B	-----
	TK-5240A	-----
TK-5240B	-----	
TK-5260A	-----	

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>PURIFICATION (CONT.)</i>	TK-5260B	-----
	TK-5300A	-----
	TK-5300B	-----
	TK-5310A	-----
	TK-5310B	-----
	TK-5320A	-----
	TK-5320B	-----
	TK-5330A	-----
	TK-5330B	-----
	TK-5340A	-----
	TK-5340B	-----
	TK-5350A	-----
	TK-5350B	-----
	TK-5380A	-----
	TK-5380B	-----
	TK-5390A	-----
	TK-5390B	-----
	TK-5400A	-----
	TK-5400B	-----
	TK-5410A	-----
	TK-5410B	-----
	TK-5420A	-----
	TK-5420B	-----
	TK-5430A	-----
	TK-5430B	-----
	TK-5440A	-----
	TK-5440B	-----
	TK-5482A	-----
	TK-5482B	-----
	TK-5484A	-----
TK-5484B	-----	
TK-5500A	-----	

PROCESS	EMISSION SOURCE	CONTROL EQUIPMENT
<i>PURIFICATION (CONT.)</i>	TK-5500B	-----
	TK-5600A	-----
	TK-5600B	-----
	TK-5640A	-----
	TK-5640B	-----
	TK-5630A	-----
	TK-5630B	-----
	TK-5670A	-----
	TK-5670B	-----
	TK-5710A	-----
	TK-5710B	-----
	TK-5800A	-----
	TK-5800B	-----

ATTACHMENT II - PROCESS EQUIPMENT

A. Combustion Equipment

COMBUSTION UNIT	CAPACITY	INFORMATION
Generator 510F	2.0 eMW	Model: 20000.0 DQKC-2983 Serial No.: L020449733 Manufacturer: Cummings
Generator 510G	2.0 eMW	Model: 20000.0 DQKC-2983 Serial No.: K0200442336 Manufacturer: Cummings
Generator 510H	2.0 eMW	Model: 20000.0 DQKC-2983 Serial No.: K0202442336 Manufacturer: Cummings

COMBUSTION UNIT	CAPACITY	INFORMATION
Generator Y-SG-101	2.25 eMW	Model: 3516 Serial No.: 1HZ02345 Manufacturer: Caterpillar
Generator Y-SG-102	2.25 eMW	Model: 3516 Serial No.: 1HZ02344 Manufacturer: Caterpillar
Generator Y-SG-103	# 2.25 eMW	To be provided later
Emergency Pump P-8195A	375 hp	Model: JW6H-UF60 Serial No.: RG6081H159501 Manufacturer: John Deere
Boiler # 2 (501)	300 hp	Model: N300 Serial No.: 3658 Manufacturer: Superior
Boiler # 3: (502)	300 hp	Model: N300 Serial No.: 3657 Manufacturer: Superior
Boiler # 5: (505)	1,100 hp	Model: FM – 2886 Serial No.: 24786 Manufacturer: Babcock & Wilcox
Boiler # 201 A	600 hp	Model: NB-5278 Serial No.: 338330601A94A Manufacturer: Superior
Boiler # 201 B	300 hp	Model: NHAA6300E Serial No.: 5640-5889 Manufacturer: Superior
Boiler: S-7610A	55,000 Lb/hr	Model: FM 10-70 Serial No.: 201-3364 Manufacturer: Babcock & Wilcox

COMBUSTION UNIT	CAPACITY	INFORMATION
Boiler: S-7610B	55,000 Lb/hr	Model: FM 10-70 Serial No.: 201-3365 Manufacturer: Babcock & Wilcox
Generator 510A	100 KW	Model: 3170A- 0810 Serial No.: AD126428 SLK Manufacturer: Lima Electric Co.
Generator 510B	60 KW	Model: UC1224D16 Serial No.: K940561815 Manufacturer: Power Technologies
Generator 510C	100 KW	Model: UC1274D Serial No.: F990929257 Manufacturer: Power Technologies Inc.
Generator 510D	300 KW	Model: SR4 Serial No.: 6BA03454 Manufacturer: Caterpillar
Generator 510E	40 KW	Model: DMT40C Serial No.: 870458 Manufacturer: Cummings
Generator 511B	800 KW	Model: 682FDR7039HHW Serial No.: ND-19-50254-4/5 Manufacturer: Cummings
Generator 511C	350 KW	Model: NTA855G3 Serial No.: 35024 Manufacturer: Cummings
Generator 511D	1.6 MW	Model: SR4B Serial No.: 5WN01416 Manufacturer: Caterpillar