

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

November 1, 2024

PERMIT TO INSTALL
127-24

ISSUED TO
Pharmacia & Upjohn Company, LLC

LOCATED AT
7000 Portage Street
Kalamazoo, Michigan 49001

IN THE COUNTY OF
Kalamazoo

STATE REGISTRATION NUMBER
B3610

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

October 30, 2024

DATE PERMIT TO INSTALL APPROVED:

November 1, 2024

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS 2

POLLUTANT / MEASUREMENT ABBREVIATIONS..... 3

GENERAL CONDITIONS 4

EMISSION UNIT SPECIAL CONDITIONS..... 6

 EMISSION UNIT SUMMARY TABLE 6

 EUC41MILLING-S3..... 7

 EUB41MILLINGRM2-S3 9

APPENDIX 9-S3 Rotoclone/Wet Scrubber/Dry Filter Maintenance and Malfunction Abatement Program..... 12

Appendix 12-S3. Particulate Control Equipment Operating Ranges..... 14

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUC41MILLING-S3	Portable equipment used for milling, sieving, screening, and bolting, located within the milling rooms 1, 3 and-4. Located in Building 41.	08-03-1993	FGC41PSDREGIONIII-S3, FGC41MICVOC-S3
EUB41MILLINGRM2-S3	Portable equipment used for milling, sieving, screening, and bolting, located within the milling room 2. Located in Building 41.	TBD	FGC41PSDREGIONIII-S3, FGC41MICVOC-S3

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EUC41MILLING-S3 EMISSION UNIT CONDITIONS

DESCRIPTION

Portable equipment used for milling, sieving, screening, and bolting, located within the milling rooms 1, 3 and 4. Located in Building 41.

Flexible Group ID: FGC41PSDREGIONIII-S3, FGC41MICVOC-S3

POLLUTION CONTROL EQUIPMENT

W-Rotoclone on T-18.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Particulate	0.044 pph ¹	Hourly	EUC41MILLING-S3	SC VI.1	R 336.1225
2. Particulate	0.2 tpy ¹	Based on a 12-month rolling time period	EUC41MILLING-S3	SC VI.1	R 336.1225
3. Particulate	0.006 lb / 1000 lbs of exhaust gas, calculated on a dry gas basis	Hourly	EUC41MILLING-S3	SC VI.1	R 336.1331(1)(c)
4. Opacity	5 %	6-Minute Average	EUC41MILLING-S3	SC VI.2	R 336.1301

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUC41MILLING-S3 equipment unless the W-Rotoclone is installed, maintained, and operated properly. **(R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain the W-Rotoclone with a water flow rate gauge. **(R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall calculate and record the actual particulate emission rates on a monthly and 12-month rolling time period basis, determined at the end of each calendar month. **(R 336.1225, R 336.1331(1)(c))**
2. The permittee shall conduct and record the results of a visible emission observation (described in Appendix 3-S3) of the W-Rotoclone exhaust. The reading shall be performed once per calendar month during a period when the rotoclone is being operated. **(R 336.1301)**
3. The permittee shall monitor and keep a separate record for each calendar month of the W-Rotoclone water flow rate according to the program described in Appendix 9-S3. The reading shall be compared to the acceptable ranges detailed in Appendix 12-S3. The reading shall be performed once per calendar month during a period when the rotoclone is being operated. **(R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**

See Appendices 3-S3, 9-S3, and 12-S3

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPFT-18	10.5 ¹	41.8 ¹	R 336.1225

IX. OTHER REQUIREMENTS

1. The permittee shall implement the Malfunction Abatement Program, detailed in Appendix 9-S3, when either of the following occurs: **(R 336.1911)**
 - a) Visible emissions have been observed from the W-Rotoclone exhaust according to the requirement in SC VI.2.
 - b) The water flow rate is observed outside the acceptable operating range listed in Appendix 12-S3 according to the requirement in SC VI.3.

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

EUB41MILLINGRM2-S3 EMISSION UNIT CONDITIONS

DESCRIPTION

Portable equipment used for milling, sieving, screening, and bolting, located within the milling room 2. Located in Building 41.

Flexible Group ID: FGC41PSDREGIONIII-S3, FGC41MICVOC-S3

POLLUTION CONTROL EQUIPMENT

HEPA filter on SVMILL9003-1,
HEPA filter on SVFANE8998-01,
HEPA filter on SVFANE9009-01,
HEPA filter on SVFANE9014-01,
HEPA filter on SVFANE9017-01

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.01 lb / 1000 lbs of exhaust gas, calculated on a dry gas basis	Hourly	EUB41MILLINGRM2-S3	SC VI.1	R 336.1331(1)(c)
2. PM	0.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUB41MILLINGRM2-S3	SC VI.2	R 336.1225
3. PM10	0.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUB41MILLINGRM2-S3	SC VI.2	40 CFR 52.21(c) and (d)
4. PM2.5	0.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUB41MILLINGRM2-S3	SC VI.2	40 CFR 52.21(c) and (d)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Mavacoxib (CAS No. 170569-88- 7)	150 kg/lot	Calendar Month	EUB41MILLINGRM 2-S3	SC VI.4	R 336.1226

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUB41MILLINGRM2-S3 unless all HEPA filters are installed, maintained, and operated in a satisfactory manner. Satisfactory operation and maintenance include following the program described in Appendix 9-S3. **(R 336.1205, R 336.1910, 40 CFR 52.21(c) and (d))**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the pressure drop from each HEPA Filter within EUB41MILLINGRM2-S3 on a calendar month. **(R 336.1205 R 336.1225, R 336.1910, 40 CFR 52.21(c) and (d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall calculate and keep, in a satisfactory manner, monthly and 12-month rolling total PM, PM10 and PM2.5 mass emission rate records in tons per year for EUB41MILLINGRM2-S3. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, 40 CFR 52.21(c) and (d))**
3. The permittee shall monitor and keep a separate record for each calendar month of the HEPA filter differential pressure according to the program described in Appendix 9-S3. The reading shall be compared to the acceptable ranges detailed in Appendix 12-S3. The reading shall be performed once per calendar month during a period when the HEPA filters are being operated. **(R 336.1205, R 336.1331(c), R 336.1910, 40 CFR 52.21(c) & (d))**
4. The permittee shall keep monthly records of Mavacoxib lot size for EUB41MILLINGRM2-S3. **(R 336.1226)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUB41MILLINGRM2-S3. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVMILL9003-1*	3	45	R 336.1225, 40 CFR 52.21(c) and (d))
2. SVFANE8998-01*	6	45	R 336.1225, 40 CFR 52.21(c) and (d))
3. SVFANE9009-01*	8	45	R 336.1225, 40 CFR 52.21(c) and (d))
4. SVFANE9014-01*	12	45	R 336.1225, 40 CFR 52.21(c) and (d))

*Vents with a gooseneck downward

IX. OTHER REQUIREMENTS

1. The permittee shall implement the Malfunction Abatement Program, detailed in Appendix 9-S3, when either of the following occurs: **(R 336.1911)**
 - a. The pressure differential is observed outside the acceptable operating range listed in Appendix 12-S3 according to the requirement in SC VI.3.

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

APPENDIX 9-S3 Rotoclone/Wet Scrubber/Dry Filter Maintenance and Malfunction Abatement Program

The permittee shall use the following approved formats and procedures for the maintenance and malfunction abatement program requirements referenced in Tables EUC41MILLING-S3, EUC41NEOSTOR&HANDL-S3, EUC41NEOSPRAYDRYER-S3, EUC41MICKK33-S3, EUC41MICRONIZING-S3, EUCR138-S3, EUCR1127-S3, EUCR1155-S3, EUCR1166-S3, EUCR1195-S3, EUCR244-S3, EUCR2149-S3, EUCR373-S3, EUCR3173-S3, EUCR3207-S3, EUCR3225-S3, EUCR466-S3, EUCR476-S3, EUCR491COM-S3, EUCR4335-S3, EUC38R6ALL-S3, EUC120R6AL-S3, EUB41MILLINGRM2-S3, and EUC41MicroMod7

These procedures are in addition to the normal periodic preventative maintenance program that is to be performed on the control equipment. All records shall be maintained for a minimum of 5 years.

These procedures are to be implemented when the monthly control device operating parameter monitoring detailed in the emission group tables results in a pressure, water flow, differential pressure outside the acceptable range listed in Appendix 12-S3.

These procedures are also to be implemented when the monthly visible emission monitoring detailed in the emission group tables results in the presence of visible emissions, as defined in Appendix 3-S3.

DRY FILTER DEVICES (Dust Collector, Bag house, HEPA Filter, HEF Bag in/Bag out Filter)

If the observed differential pressure reading (mm Hg or inches H₂O) is outside the acceptable operating range, or visible emission are observed, implement the following Malfunction Abatement Program:

1. Initiate a root cause analysis for the device.
2. Issue a work order request for the appropriate repair.
3. Following repairs, re-inspect the device and document that it is operating properly, and the differential pressure is within the acceptable operating range.
4. Repeat the visible emissions observation for the respective stack.
5. Document any additional comments.
6. Submit completed documentation of the repairs and re-inspection to the appropriate Environmental Compliance personnel.

WET SCRUBBERS

If the water flow reading (GPM) is outside the acceptable operating range, or if visible emissions are observed, implement the following Malfunction Abatement Program:

1. Initiate a root cause analysis for the device.
2. Issue a work order request for the appropriate repair.
3. Following repairs, re-inspect the device and document that it is operating properly, and the water flow is within the acceptable operating range.
4. Repeat the visible emissions observation for the respective stack.
5. Document any additional comments.
6. Submit completed documentation of the repairs and re-inspection to the appropriate Environmental Compliance personnel.

W-ROTOCLONES

If the observed water pressure (psi) or water flow reading (gal/min) is below the acceptable minimum operating set point, or if visible emissions are observed, implement the following Malfunction Abatement Program:

1. Initiate a root cause analysis for the device.
2. Issue a work order request for the appropriate repair.
3. Following repairs, re-inspect the device and document that it is operating properly, the water pressure is above the acceptable minimum operating set point, and that the automatic low-pressure cutoff is working properly.
4. Repeat the visible emissions observation for the respective stack.
5. Document any additional comments.

6. Submit completed documentation of the repairs and re-inspection to the appropriate Environmental Compliance personnel.

N-ROTOCLONES

If the observed water level (inches) is below the acceptable operating range, or if visible emissions are observed, implement the following Malfunction Abatement Program:

1. Initiate a root cause analysis for the device.
2. Issue a work order request for the appropriate repair.
3. Following repairs, re-inspect the device and document that it is operating properly, the water level is within the acceptable operating range, and that the automatic low-level cutoff is working properly.
4. Repeat the visible emissions observation for the respective stack.
5. Document any additional comments.
6. Submit completed documentation of the repairs and re-inspection to the appropriate Environmental Compliance personnel.

Appendix 12-S3 Particulate Control Equipment Operating Ranges

Rotoclone/ Scrubber	Fabric Filter	Emission Unit	Acceptable min/max or min GPM water	Acceptable minimum water pressure (psi)	Acceptable min/max differential pressure (inches of water)	Acceptable minimum water level (inches)
T-18		EUC41MILLING-S3	1			
	041MILL 9003-1	EUB41MILLINGRM2-S3			Engineering Specifications ^b	
	041FAN E8998- 01	EUB41MILLINGRM2-S3			Engineering Specifications ^b	
	041FAN E9009- 01	EUB41MILLINGRM2-S3			Engineering Specifications ^b	
	041FAN E9017- 01	EUB41MILLINGRM2-S3			Engineering Specifications ^b	
	041FAN E9014- 01	EUB41MILLINGRM2-S3			Engineering Specifications ^b	

^b – Parameter range to be updated upon incorporation into MI-ROP-B3610-2021a.