

AIR EMISSION PERMIT NO. 07700010- 002
Administrative Amendment

IS ISSUED TO

ANI Pharmaceuticals Inc

ANI PHARMACEUTICALS INC
210 Main Street West
Baudette, Lake of the Woods County, MN 56623

The emission units, control equipment and emission stacks at the stationary source authorized in this permit amendment are as described in the Permit Applications Table.

This permit amendment supersedes Air Emission Permit No. 07700010-001 and authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the State Implementation Plan under 40 CFR § 52.1220 and as such as are enforceable by U.S. Environmental Protection Agency Administrator or citizens under the Clean Air Act.

Permit Type: State; Limits to Avoid Pt 70

Operating Permit Issue Date: September 3, 2002

Administrative Amendment Issue Date: September 15, 2008

Expiration Date: Non-expiring
Title I Conditions do not expire.

Don Smith, Manager
Air Quality Permits Section
Industrial Division

for Brad Moore
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit	4/17/1995, 1/5/2001, 10/23/2001	001
Administrative Amendment	5/18/2007	002

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Permit Action 002 – Administrative Amendment

Table A: Limits and Other Requirements

Table B: Submittals

Table C: Compliance Schedule – *Not used in this permit*

Appendices: Attached and Referenced in Table A

Appendix A *Not used in this permit*

Appendix B Insignificant Activities and Applicable Requirements

NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

ANI Pharmaceuticals (formerly Solvay Pharmaceuticals) is primarily engaged in the production of pharmaceutical products. Associated with this pharmaceutical production is a tablet coating activity. Methylene chloride and methanol are Hazardous Air Pollutants (HAPs) emitted from this tablet finishing activity (which includes equipment cleanup). Emissions of these HAPs as the facility currently exists are above the thresholds for a Part 70 source.

The Permittee installed a Regenerative Thermal Oxidizer (RTO) system, consisting of an RTO and a scrubber, for control of HAPs from the tablet coating system (EU 011 Accela-coater and EU 012 Coating Prep Room). The RTO provides control for methylene chloride and methanol; the scrubber will be used to remove hydrochloric acid that is produced as a result of oxidation of the chlorinated compounds. The RTO system provides control such that the facility's HAPs emissions are less than the Part 70 thresholds. The facility is not a major facility for Part 70 or for maximum achievable control technology (MACT), and is not subject to the promulgated MACT standard for the pharmaceutical industry.

PERMIT ACTION 002 – Administrative Amendment

This administrative amendment is for a change in ownership of the facility from Solvay Pharmaceuticals to ANI Pharmaceuticals, Inc.

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: ANI Pharmaceuticals Inc
 Permit Number: 07700010 - 002

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility

What to do	Why to do it
OPERATIONAL REQUIREMENTS	hdr
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
MONITORING REQUIREMENTS	hdr
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING REQUIREMENTS	hdr
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007. 0800, subp. 5(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: ANI Pharmaceuticals Inc
 Permit Number: 07700010 - 002

<p>When the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. For nonexpiring permits, these records shall be kept for a period of five years from the date that the change was made. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.</p>	<p>Minn. R. 7007.1200, subp. 4</p>
<p>REPORTING/SUBMITTALS</p>	<p>hdr</p>
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	<p>Minn. R. 7019.1000, subp. 3</p>
<p>Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.</p> <p>At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.</p>	<p>Minn. R. 7019.1000, subp. 2</p>
<p>Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.</p>	<p>Minn. R. 7019.1000, subp. 1</p>
<p>Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description:</p> <ol style="list-style-type: none"> 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation. 	<p>Minn. R. 7019.1000, subp. 1</p>
<p>Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.</p>	<p>Minn. R. 7007.1150 through Minn. R. 7007.1500</p>
<p>Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).</p>	<p>Minn. R. 7007.1400, subp. 1(H)</p>
<p>Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. The Permittee shall submit this on a form approved by the Commissioner.</p>	<p>Minn. R. 7019.3000 through Minn. R. 7019.3010</p>
<p>Emission Fees: due 60 days after receipt of an MPCA bill.</p>	<p>Minn. R. 7002.0005 through Minn. R. 7002.0095</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: ANI Pharmaceuticals Inc

Permit Number: 07700010 - 002

Subject Item: SV 009 RTO System

Associated Items: EU 011 Accela-coater

EU 012 Coating Prep Room

What to do	Why to do it
POLLUTANT AND OPERATING CONDITION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Methanol: greater than or equal to 95 percent control efficiency . The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for VOC and HAPs of 95%.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; To avoid major source classification under 40 CFR Section 70.2; Minn. R. 7007.0200
Methylene chloride (dichloromet: greater than or equal to 95 percent control efficiency . The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for VOC and HAPs of 95%.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; To avoid major source classification under 40 CFR Section 70.2; Minn. R. 7007.0200
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate and maintain the RTO System (regenerative thermal oxidizer and scrubber) any time that any process equipment controlled by the RTO System is in operation.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; To avoid major source classification under 40 CFR Section 70.2; Minn. R. 7007.0200
Temperature: greater than or equal to 1400 degrees F absolute minimum at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for HAP emissions was demonstrated. If the temperature drops below the minimum temperature limit, this shall be reported as a deviation.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; To avoid major source classification under 40 CFR Section 70.2; Minn. R. 7007.0200
Scrubber Recirculation pH: the pH shall be maintained within the range of greater than or equal to 7.5 and less than or equal to 9.5, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average pH recorded during the most recent MPCA approved performance test where compliance for HAP emissions was demonstrated. If the pH goes outside the range, this shall be reported as a deviation.	Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall maintain a continuous hard copy readout or computer disk file of the temperature readings for the combustion chamber. The Permittee shall record the pH of the scrubber recirculation at least one time per operating shift.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; To avoid major source classification under 40 CFR Section 70.2; Minn. R. 7007.0200
Daily Monitoring: The Permittee shall physically check the temperature and recirculation pH recording devices at least once each operating day to verify that they are working and recording properly.	Minn. R. 7007.0800, subp. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 1.5 percent of the temperature being measured or +/- 21 degrees Celsius.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the temperature and scrubber flow rate monitors at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-4

09/15/08

Facility Name: ANI Pharmaceuticals Inc

Permit Number: 07700010 - 002

Corrective Actions: If the temperature is below the minimum specified by this permit or if the thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall operate and maintain the RTO System in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due 180 days after 09/03/2002 to measure methanol and methylene chloride emissions. This performance test has been completed as indicated in the MPCA notice of compliance dated May 14, 2003.	Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-5

09/15/08

Facility Name: ANI Pharmaceuticals Inc

Permit Number: 07700010 - 002

Subject Item: EU 007 Boiler 7 Kewanee

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (PTE is 0.007 lb/million Btu per design, using AP-42 emission factors)	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuel Type: Natural gas only, by design	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-6

09/15/08

Facility Name: ANI Pharmaceuticals Inc

Permit Number: 07700010 - 002

Subject Item: EU 009 Generator

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input (PTE is 0.29 lbs/million Btu per equipment design, using AP-42 emission factors).	Minn. R. 7011.2300, subp. 2
Fuel Type: No. 2 distillate fuel only, by design.	Minn. R. 7007.0800, subp. 2
Recordkeeping - Hours of Operation: The Permittee shall record the number of hours the unit was operated at the end of each period of operation. The documentation shall be maintained on-site to show that the unit is an emergency generator by design that qualifies under the U.S. EPA memorandum entitled "Calculating Potential to Emit (PTE) for Emergency Generators" dated September 6, 1995, limiting operation to 500 hours per year.	Minn. R. 7007.0800, subps. 4 and 5
Recordkeeping - Fuel Type: The Permittee shall keep records of the type of fuel burned in EU 009 when in operation.	Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-7

09/15/08

Facility Name: ANI Pharmaceuticals Inc

Permit Number: 07700010 - 002

Subject Item: EU 034 Burnham Boiler 2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (PTE is 0.007 lb/million Btu per design, using AP-42 emission factors)	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuel Type: Natural gas only, by design	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-8

09/15/08

Facility Name: ANI Pharmaceuticals Inc

Permit Number: 07700010 - 002

Subject Item: EU 035 Burnham Boiler 3

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (PTE is 0.007 lb/million Btu per design, using AP-42 emission factors)	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuel Type: Natural gas only, by design	Minn. R. 7007.0800, subp. 2

TABLE B: SUBMITTALS

B-1 09/15/08

Facility Name: ANI Pharmaceuticals Inc
Permit Number: 07700010 - 002

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

TABLE B: RECURRENT SUBMITTALS

B-2 09/15/08

Facility Name: ANI Pharmaceuticals Inc

Permit Number: 07700010 - 002

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 09/03/2002 (for the previous calendar year). To be submitted to the Commissioner on a form approved by the Commissioner. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX B

Insignificant Activities and Applicable Requirements

Facility Name: ANI Pharmaceuticals

Permit Number: 07700010-002

Under Minn. R. 7007.1250, subp. 1(A), the Permittee may add insignificant activities to the stationary source throughout the term of the permit without getting permit amendments. Certain exclusions apply and are listed in Minn. R. 7007.1250, subp. 2.

The following sources at the Permittee's facility qualify as insignificant activities under Minn. R. 7007.1300, subs. 2, 3 and 4 and are not required to be listed in the permit.

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Likely Applicable Requirement
3(D)(2)	Processing Operations (PM/PM10 emissions are filtered through an air cleaning system and vented inside of the building 100% of the time) <ul style="list-style-type: none">• <i>Torit-Donaldson Model 84 dust collector unit, located in Room No. 1608, which services activities in Technical Service's Rooms No. 1416 and 1418;</i>• <i>Torit-Donaldson Model 66 portable dust collector unit, located in Room No. 1212, which services activities in the liquid processing area (Room Nos. 1212, 1214, 1216)</i>	Minn. R. 7011.0715
3(G)	Emissions from a laboratory. <ul style="list-style-type: none">• <i>Various laboratories, currently No. 1400 and No. 1500 areas, which provide quality control testing support to the facility production.</i>	Minn. R. 7011.0715
3(H)(1)	Miscellaneous (uses less than 200 gallons of VOC for any consecutive 12-month period) <ul style="list-style-type: none">• <i>Cleaning of production process equipment and operation with an alcohol-based solvent</i>	Minn. R. 7011.0715
3(H)(4)	Miscellaneous (brazing, soldering, or welding equipment) <ul style="list-style-type: none">• <i>Facility maintenance welding operations</i>	Minn. R. 7011.0715
3(H)(8)	Miscellaneous (cleaning operations) <ul style="list-style-type: none">• <i>Various production process equipment cleaned with alkaline-based cleaning solutions</i>	Minn. R. 7011.0715
3(I)(2)	Individual emission units at a stationary source which each have a potential to emit of each of the following pollutants less than: 2,000 pounds per year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, VOCs, and ozone. <i>ANI has several of these individual emissions units; many of</i>	Minn. R. 7011.0715

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Likely Applicable Requirement
	<p><i>these are controlled by a dust collector. These include:</i></p> <ul style="list-style-type: none"> • <i>Cooling tower</i> • <i>Vector coater</i> • <i>Inspection room</i> • <i>Tablet polishing</i> • <i>Imprinting rooms 1 and 2</i> • <i>Mixing rooms 1 and 2</i> • <i>Gemco</i> • <i>Tech services mixing room</i> • <i>Tech services prep area</i> • <i>QA sample room</i> • <i>Packaging Lines 1,2, 3 and 4</i> • <i>Gruenberg ovens (nos. 8 and 11)</i> • <i>Dristeam Humidifiers 1 and 2</i> • <i>Imprinters (Ackley – room 1846, Markem 156A – room 1844, Markem 156MK2 – room 1844)</i> • <i>Equipment parts washer, located in Room No. 1802 – 30 gallon capacity (Davco petroleum naptha solvent)</i> • <i>Various small tanks containing aqueous-based chemical treatment solutions for process water supply purification and cooling tower water supply conditioning</i> 	
3(K)	<p>Plant upkeep</p> <ul style="list-style-type: none"> • <i>Infrequent use of spray paint equipment</i> 	Minn. R. 7011.0715

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 07700010-002

This technical support document is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp.1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the permit.

1 General Information

1.1 Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 2834)
ANI Pharmaceuticals 210 Main St W Baudette Lake of the Woods County	210 Main St W Baudette Lake of the Woods County
Contact: James Marken Phone: 218-634-3584	

1.2 Description of the Facility

ANI Pharmaceuticals, Inc. (formerly Solvay Pharmaceuticals) is primarily engaged in the production of pharmaceutical products.

1.3 Description of this Permit Action

An administrative amendment application was received on May 18, 2007, in accordance with Minn. R. 7007.1400, subp. 1(E), that indicated a change in ownership from Solvay Pharmaceuticals to ANI Pharmaceuticals, Inc. The ownership change was effective on May 7, 2007. ANI Pharmaceuticals, Inc. agrees to comply with all terms of the existing permit. The change in ownership is the only change allowed by this permit action.

The permit has been updated to reflect current MPCA policy regarding citations, recordkeeping, emissions inventory, and monitoring equipment (requirement removed).

2 Conclusion

Based on the information provided by ANI Pharmaceuticals, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission

Permit No. 07700010-002 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Sarah Sevcik (permit writer/engineer)
Tarik Hanafy (peer reviewer)
Andy Place (stack testing)

AQ File No. 2435A, DQ# 1534

Attachments: 1. Facility Description and CD-01 Forms