The Iowa Department of Natural Resources (DNR) finds that:

1. Cambrex Charles City, Inc., located at 1205 11th Street, Charles City, IA 50616 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is John Andrews.

2. Cambrex Charles City, Inc. is a pharmaceutical and chemical products manufacturing facility. This facility consists of 95 emission units with potential emissions of:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Abbreviation</th>
<th>Potential Emissions (Tons per Year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (≤ 2.5 µm)</td>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>4.51</td>
</tr>
<tr>
<td>Particulate Matter (≤ 10 µm)</td>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>4.51</td>
</tr>
<tr>
<td>Particulate Matter</td>
<td>PM</td>
<td>4.51</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>SO&lt;sub&gt;2&lt;/sub&gt;</td>
<td>2.90</td>
</tr>
<tr>
<td>Nitrogen Oxides</td>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>0.00</td>
</tr>
<tr>
<td>Volatile Organic Compounds</td>
<td>VOC</td>
<td>98.00</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>CO</td>
<td>5.14</td>
</tr>
<tr>
<td>Lead</td>
<td>Lead</td>
<td>0.00</td>
</tr>
<tr>
<td>Hazardous Air Pollutants&lt;sup&gt;(1)&lt;/sup&gt;</td>
<td>HAP</td>
<td>24.4</td>
</tr>
</tbody>
</table>

<sup>(1)</sup> May include the following: Acetonitrile, Dimethylformamide, Chlorobenzene, Ethylene Glycol, Formaldehyde, Hexane, HCl, Methanol, Methylene Chloride, MIKB, MTBE, Toluene and Triethylamine.

<sup>(2)</sup> Cambrex Charles City, Inc. is an area source subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart VVVVV which requires the facility to apply for a Title V permit for the affected units. Therefore the facility is required to apply for a Title V permit and, under 567 Iowa Administrative Code 22.101(1)c", only the NESHAP affected units at the facility must be covered by the Title V permit.

3. Cambrex Charles City, Inc. submitted a Title V Operating Permit renewal application on December 2, 2019. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.

4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.
DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from April 16, 2020 through May 16, 2020. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Rayeann Archibald at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.

2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Rayeann Archibald at the DNR address shown below.

3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Rayeann Archibald
Iowa Department of Natural Resources - Air Quality Bureau
Wallace State Office Building
502 E 9th St.
Des Moines, Iowa 50319-0034
Phone: (515) 725-9520
E-mail: rayeann.archibald@dnr.iowa.gov

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.

2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.

3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.

4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.

5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.
Title V Permit Renewal 1 Review Notes

Facility Name: Cambrex Charles City, Inc.
City: Charles City
County: Floyd
Facility #: 34-01-015
EIQ #: 92-4536
Renewal Application: 12/2/2019
Received:
Permit #: 15-TV-007R1
Reviewer: Rayeann Archibald

Background:
Cambrex Charles City, Inc. is a pharmaceutical and chemical products manufacturing facility and has applied to renew their Title V permit. The facility has five (5) emission points and ninety-five (95) emission units. Application was received 12/2/2019.

Title V Applicability

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Major for Title V?</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM₁₀</td>
<td></td>
</tr>
<tr>
<td>SO₂</td>
<td></td>
</tr>
<tr>
<td>NOₓ</td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td></td>
</tr>
<tr>
<td>Lead</td>
<td></td>
</tr>
<tr>
<td>Individual HAP</td>
<td></td>
</tr>
<tr>
<td>Total HAPs</td>
<td></td>
</tr>
</tbody>
</table>

Potential emissions of criteria pollutants and HAP's from this facility do not exceed major source thresholds. A portion of this facility is subject to 40 CFR 63 Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources.  63.11494"e" states "Any area source that installed a federally-enforceable control device on an affected CMPU is required to obtain a permit under 40 CFR part 70 or 40 CFR part 71 if the control device on the affected CMPU is necessary to maintain the source's emissions at area source levels." The portion of the facility that is included in this Title V permit are considered to be CMPUs by the Subpart due to the use of Methylene Chloride in the processes.

Program Applicability

- PSD: No, this facility is a synthetic minor source.
- Part 60 NSPS: Yes
  - 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels)
• Part 61 NESHAP: Yes, facility is subject only to the Subpart M NESHAP for the demolition and renovation of asbestos containing structures identified in 40 CFR 61.145.
• Major Source of HAPs: No
• Part 63 NESHAP: Yes
  o 40 CFR 63 Subpart VVVVVV – National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources (CMAS)
• Acid Rain: No.
• Stratospheric Ozone Protection: Yes.
• Prevention of Accidental Releases: No.

Construction Permits Modified

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Permit Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>303</td>
<td>Pharma 1 Production Facility</td>
<td>95-A-445-S21</td>
</tr>
<tr>
<td>304</td>
<td>Manufacturing Process Bypass</td>
<td>12-A-561-S2</td>
</tr>
<tr>
<td>306</td>
<td>Manufacturing Process Bypass</td>
<td>13-A-176-S2</td>
</tr>
<tr>
<td>308</td>
<td>Bypass Vent for Hydrogen</td>
<td>14-A-626-S1</td>
</tr>
</tbody>
</table>

New Construction Permit since Initial Permit

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Permit Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>309</td>
<td>Pharma Production Facility Units Connected to Flame Arrestor</td>
<td>19-A-067</td>
</tr>
</tbody>
</table>

General Comments:
• Update Permit Number
• Update Responsible Official and Phone Number
• Update Permit Contact Title
• Update Footers
• Update General Conditions

Emission Point Specific Comments

EP-309 - The reactors listed are not affected emission units under Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart RRR (Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes), because these reactors are designated and operated as batch operations.

The tanks are not subject to 40 CFR 60 Subpart Kb as they are less than 19,000 gallons.

Page 19 – Condition M – should reference Condition J. Will be corrected at next construction permit modification.
Page 21 – Condition V – should reference Condition J. Will be corrected at next construction permit modification.
Field Office Inspection conducted 1/24/2019 found following issues:
1. The cryogenic vapor recovery control efficiency for inorganic acidic HAP emissions of the Pharma I scrubber should be 98%. This appears that this is a scrivener error and it is likely that the control efficiency should be 95%.
   • Follow-up with engineer confirmed 98% control efficiency for inorganic acidic HAP emissions is correct.
2. The Pharma I scrubber maintenance tracking form should be modified so it captures the total hours of downtime, not just start and stop times.
   • New Construction Permit 95-A-445-S21 addresses the recordkeeping to include downtime.

**Periodic Monitoring**
Not required for control equipment as the Operating Requirements with Associated Monitoring and Recordkeeping contained in the Construction Permit and 40 CFR 63 Subpart VVVVVV are appropriate.

**Compliance Assurance Monitoring (CAM)**
CAM does not apply because the facility is not a major source for Title V.