



State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection  
Bureau of Air Quality Engineering  
401 E. State Street - 2nd Floor  
CN-027  
Trenton, New Jersey 08625-0027

Robert C. Shinn, Jr.  
Commissioner

CERTIFIED MAIL

Mr. Hassan Nekoui, Manager  
Environmental Services (Air)  
Sandoz Pharmaceuticals Corporation  
59 Route 10  
East Hanover, New Jersey 07936

REFERENCE: Facility Specific Emission Limit (FSEL) for  
Nitrogen Oxides (NOx)  
Pursuant to N.J.A.C. 7:27-19.13

FACILITY NAME: Sandoz Pharmaceuticals Corporation

LOCATION: 59 Route 10  
East Hanover (Morris County), New Jersey

APC PLANT ID# - STACK#: 25017-034

APC PERMIT CERTIFICATE#: 104855

SOURCE DESCRIPTION: Small scale (780 lbs/hr) trash fired boiler  
energy recovery system (TFB), using natural  
gas as an auxiliary fuel.

APPROVAL DATE: 3/23/95

Dear Mr. Nekoui:

On the basis of all the information available to the New Jersey Department of Environmental Protection (the Department) in reference to the application for a facility specific emission limit (FSEL) for the TFB, which was submitted on April 25, 1994 pursuant to N.J.A.C. 7:27-19.13, the Department has determined that the proposed FSEL satisfies the requirements of the New Jersey Air Pollution Regulations codified at N.J.A.C. 7:27-19.13. The Department therefore concludes that the FSEL is justified for the TFB, which is used to burn waste and provide steam for the Sandoz Pharmaceuticals Corporation Plant. Accordingly, the Department approves this FSEL with the attached conditions.

Compliance with the attached conditions (Attachment-I), effective on May 31, 1995 and continuing thereafter, will satisfy the

Mr. Hassan Nekoui  
Page 2 of 2

requirements of N.J.A.C. 7:27-19 for Sandoz Pharmaceuticals Corporation for the TFB, located in East Hanover, New Jersey.

If in your judgement as an applicant for an FSEL, the Department is imposing any unreasonable condition of approval, you may contest the Department's decision and request a contested case hearing pursuant to the Administrative Procedures Act, N.J.S.A. 52:14B-1 et seq. and the New Jersey Administrative Code at N.J.A.C. 1:1 and 7:27-8.12. All requests for a contested case hearing must be received in writing by the Department within 20 calendar days of the date you receive this approval, and must contain the information specified in Attachment-II (Administrative Hearing Request Form for Permit Actions).

If you have any questions, please call Mr. John Stull at (609) 292-2137.

Sincerely,



Iclal Atay, Ph.D., Chief  
Bureau of Air Quality Engineering

Attachments

c: William O'Sullivan, Administrator  
Donald Patterson, Assistant Director  
William Baker, USEPA Region II  
Steve Riva, USEPA Region II  
Michael Papp, NRO  
William Kuehne, Supervisor  
John Stull, Project Manager  
Steve Oliver, Senior Associate and Division Manager  
Environmental Permitting and Planning  
Paulus, Sokolowski, and Sartor, Inc.  
Consulting Engineers  
67A Mountain Boulevard Extension  
Warren, New Jersey 07059-0039

ATTACHMENT - I

CONDITIONS OF APPROVAL

FACILITY SPECIFIC EMISSION LIMIT (FSEL)  
FOR NITROGEN OXIDES EMISSIONS FROM A  
SMALL SCALE TRASH FIRED BOILER ENERGY RECOVERY SYSTEM (TFB)

SANDOZ PHARMACEUTICALS CORPORATION  
59 ROUTE 10  
EAST HANOVER, NEW JERSEY 07936

APC PLANT ID NO. 25017-034

APC PERMIT CERTIFICATE NO. 104855

EFFECTIVE DATE: MAY 31, 1995

TABLE OF CONTENTS

I. DEFINITIONS

II. CONDITIONS OF APPROVAL

- A. Reasonably Available Control Technology
- B. Facility Specific NOx Emission Limit
- C. Limit on Operation
- D. Emissions Testing and Monitoring
- E. Recordkeeping
- F. Revision of State Implementation Plan (SIP)
- G. Modification of FSEL

I. DEFINITIONS:

The Department: New Jersey Department of Environmental Protection

BTS: Bureau of Technical Services  
N.J. Department of Environmental Protection  
CN-411  
Trenton, New Jersey 08625-0411  
(609) 530-4041

TFB: small scale trash fired boiler energy recovery system located at Sandoz Pharmaceuticals Corporation Plant in East Hanover.

Lb/hr: Pounds per hour based on any consecutive 60 minute period.

Lb waste/hr: pounds of waste charged to the TFB per hour.

II. CONDITIONS OF APPROVAL

A. REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT)

RACT for the TFB has been determined to be controlled air combustion. Sandoz shall continue to implement controlled air combustion when operating the TFB.

B. FACILITY SPECIFIC NOx EMISSION LIMIT

The emission rate of nitrogen oxides (NOx) from the TFB shall not exceed 3.0 lbs/hr.

C. LIMIT ON OPERATION

The maximum feed rate to the TFB shall not exceed 780 lbs waste/hr.

D. EMISSIONS TESTING AND MONITORING

The Department may request stack emissions tests for NOx to be conducted prior to the expiration of each 5-year

certificate to operate, in order to renew the certificate to operate. If stack tests are required, a protocol in accordance with N.J.A.C. 7:27-19.17, shall be submitted for approval to the Chief, BTS, at least 180 calendar days before the tests are to be conducted. The Chief, BTS, shall be notified 30 days before stack tests are conducted to establish mutually acceptable dates in order that representatives of the Department may be scheduled to observe the performance tests.

**E. RECORDKEEPING**

1. Sandoz shall keep daily records of the waste feed rate to the TFB. These records shall include the time each load is charged to the TFB and the weight of each load. The format for these records shall be the same as that in Attachment-III.
2. All records and log books created in a calendar year shall be maintained on site for 5 additional calendar years, and made available during normal working hours for review by the Department, upon request.

**F. REVISION OF STATE IMPLEMENTATION PLAN (SIP)**

A revision to the State Implementation Plan (SIP) for ozone to include this NOx Control Plan will be submitted to EPA for approval. EPA will review the NOx Control Plan, propose action on the SIP revision and finalize its action after public comment. Denial of the SIP revision by the EPA will cause the NOx Control Plan to be revoked and will result in modification of the plan.

**G. MODIFICATION OF FSEL**

Approval of an amended FSEL will be required by the Department before any alterations may be made to the TFB that may cause the NOx emission rate to increase.



ATTACHMENT - II

Administrative Hearing Request Checklist  
and Tracking Form for Permits

I. Permit Being Appealed

\_\_\_\_\_  
Title and Type of Permit

\_\_\_\_\_  
Issuance Date of Permit

\_\_\_\_\_  
Permit Number

II. Person Requesting Hearing:

\_\_\_\_\_  
Name

\_\_\_\_\_  
Name of Attorney (If applicable)

\_\_\_\_\_  
Address

\_\_\_\_\_  
Address of Attorney

III. Please Include the Following Information as Part of Your Request:

- A. The date the permittee received the final permit;
- B. A list of all permit conditions and issues contested;
- C. The legal and factual questions at issue;
- D. A statement as to whether or not the permittee raised each legal and factual issues during the public comment period on the permit;
- E. Suggested revised or alternative permit conditions;
- F. An estimate of the time required for the hearing;
- G. A request, if necessary, for a barrier-free hearing location for physically disabled persons;
- H. A clear indication of any willingness to negotiate a settlement with the Department prior to the Department's processing of your hearing request to the Office of Administrative Law; and
- I. This form, completed, signed and dated with all the information listed above, including attachments, to:

- 1. Office of Legal Affairs  
ATTENTION: Adjudicatory Hearing Requests  
Department of Environmental Protection  
401 East State Street  
CN 402  
Trenton, New Jersey 08625-0402
- 2. Chief, Bureau of Air Quality Engineering  
Department of Environmental Protection  
CN 027  
Trenton, New Jersey 08625-0027
- 3. All co-permittees (w/attachments)