



Eli Lilly and Company

Lilly Technology Center
Indianapolis, Indiana 46285
U.S.A.
+1.317.276.2000
www.lilly.com

29 October 2024

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Attention: Compliance and Enforcement Branch, Mr. Janusz Johnson

Re: Eli Lilly and Company, Lilly Technology Center
Title V Quarterly Deviation and Compliance Monitoring Report
Permit Number TR097-43926-00072, SPM44675, AA45021,
SPM45963, AA46856, AA47466
3rd Quarter (July 1 – September 30) 2024

Dear Mr. Johnson:

Eli Lilly and Company's Lilly Technology Center (LTC) is subject to the Title V Permits identified above. Per section C.18 of the permit, as well as 326 IAC 2-7-5(3)(C), LTC is required to report deviations, as well as certain emission related information, on a quarterly basis. Please find enclosed the Title V Quarterly Deviation and Compliance Monitoring Report for the 3rd Quarter 2024.

If you have any questions pertaining to the enclosed report, please contact Donald F. Robin at (317) 651-7971.

Sincerely,

A handwritten signature in blue ink, appearing to read "Victor M. Cruz".

Mr. Victor M. Cruz
Senior Vice President of Corporate Engineering & Global HSE
Eli Lilly and Company

Enclosure – Quarterly Deviation and Compliance Monitoring Report

cc: (electronic)
Mr. Kurt Graham, P.E.
Section Chief
Indiana Department of Environmental Management
Office of Air Quality, Compliance and Enforcement Branch
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
kagraham@idem.IN.gov

Source Name: Eli Lilly and Company, Lilly Technology Center
Source Address: 1555 S. Harding Street, Indianapolis, IN
Mailing Address: Lilly Corporate Center, Indianapolis, IN 46285

Part 70 Permit Numbers: TR097-43926-00072, SPM44675,
AA45021, SPM45963, AA46856, AA47466

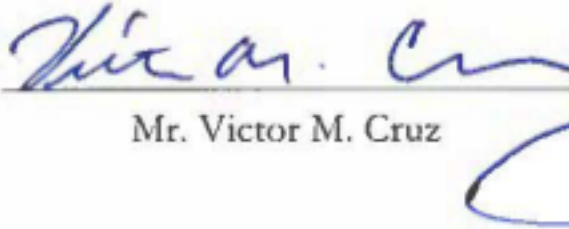
Responsible Official Certification

326 IAC 2-7-5(3)(C), 326 IAC 2-7-4(f)

To the best of my knowledge, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Senior Vice President of Corporate
Engineering & Global HSE
Eli Lilly and Company

29 October 2024



Mr. Victor M. Cruz

Title

Date

TABLE OF CONTENTS

0.	INTRODUCTION	5
1.	SECTION B – GENERAL CONDITIONS	6
2.	SECTION C - SOURCE OPERATION CONDITIONS	6
3.	SECTION D - FACILITY OPERATION CONDITIONS	7
3.1.	<i>Section D.1 – RESERVED</i>	<i>7</i>
3.2.	<i>Section D.2 – RESERVED</i>	<i>7</i>
3.3.	<i>Section D.3 – Building 302 High Bay Flex Space.....</i>	<i>7</i>
3.4.	<i>Section D.4 – BHI and Synthetic Peptide Process Areas.....</i>	<i>9</i>
3.5.	<i>Section D.5 – Building 130 Complex Area.....</i>	<i>9</i>
3.6.	<i>Section D.6 – Spray Dryer System (ESD-01)</i>	<i>9</i>
3.7.	<i>Section D.7—Architectural and Industrial Maintenance (AIM) Coatings</i>	<i>10</i>
3.8.	<i>Section D.8—Specifically Regulated Insignificant Activities (HVAC Units)</i>	<i>10</i>
4.	SECTION E--EMISSIONS UNIT OPERATION CONDITIONS	10
4.1.	<i>Section E.1 – Emergency Generators and Fire Pumps: RICE MACT (40 CFR 63, Subpart ZZZZ)</i>	<i>10</i>
4.2.	<i>Section E.2 – Emergency Generators and Fire Pumps (40 CFR 60, Subpart IIII)</i>	<i>10</i>
4.3.	<i>Section E.3 – RESERVED</i>	<i>11</i>
4.4.	<i>Section E.4 – RESERVED</i>	<i>11</i>
4.5.	<i>Section E.5 – RESERVED</i>	<i>11</i>
4.6.	<i>Section E.6 – Benzene Waste NESHAP Conditions</i>	<i>11</i>
5.	SECTION F--EMISSIONS UNIT OPERATION CONDITIONS	11
5.1.	<i>Section F.1.9 – LTC HAP Reporting Requirements</i>	<i>11</i>
5.2.	<i>Section F.2.4 – LTC HAP Reporting Requirements</i>	<i>13</i>

Title V Quarterly Deviation and Compliance Monitoring Report

0. Introduction

Source Name: Eli Lilly and Company, Lilly Technology Center

Physical Address: 1555 S. Harding Street Indianapolis, Indiana

Mailing Address: Eli Lilly and Company, Lilly Corporate Center, Indianapolis, IN 46285

Title V Permit Number: TR097-43926-00072, SPM44675, AA45021, SPM45963, AA46856, AA47466

Contact Person: Donald F. Robin, PE, Sr. Advisor – HSE, Global Facilities Management & Engineering Services

Contact Phone: 317.651.7971

Period Covered by Report: 3rd Quarter (July 1-September 30) 2024

Eli Lilly and Company's Lilly Technology Center ("LTC") operates pursuant to the Title V operating permit. This permit incorporates all applicable State air requirements and all Federally enforceable Clean Air Act requirements that apply to LTC. This Title V Quarterly Report is being submitted to satisfy the site's reporting obligations.

The specific information for this Quarterly Report is listed sequentially by the Title V permit section that contains the reporting requirements.

Definitions:

Term	Definition
Benzene Waste NESHAP	National Emission Standards for Benzene Waste Operations, 40 CFR Part 61, Subpart FF
HAP	hazardous air pollutant as listed at Section 112(b) of the Clean Air Act, 42 USC 7412(b)
LDAR	leak detection and repair
LTC	Eli Lilly and Company, Lilly Technology Center
Title V	Title V of the Clean Air Act Amendments of 1990, 42 USC 7661 et seq., and the regulations adopted thereunder at 40 CFR Part 70 and 326 IAC 2
RICE MACT	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ and 326 IAC 20-82-1
VOC	volatile organic compound, a type of air pollutant

1. Section B – General Conditions

Section B does not require the reporting of any specific data in this periodic report. The following aspects of Section B relate to reporting:

- Section B.8 requires the certification of this report by a “Responsible Official.”
- Section B.9 requires submittal of the Annual Compliance certification, which is due by April 15 of each year for the preceding calendar year. This is submitted separately.
- Section B.11 requires that all emergencies be reported. Per Section C.18(a), notices of emergencies made under B.11 need not be repeated in this report.
 - No emergencies were reported under B.11 during this reporting period.
- Section B.19 of the permit requires submittal of certain notifications of changes at the source. These are submitted separately and are not part of this quarterly report.

2. Section C - Source Operation Conditions

The following aspects of Section C are relevant:

- Section C.16 requires submittal of an emission statement every 3 years. When required, these data are submitted separately and are not a part of this report.
- Section C.18(a) requires submittal of a Quarterly Deviation and Compliance Monitoring Report not later than 30 days after the end of each calendar quarter. The report must be certified by a responsible official. This report fulfills that condition of the permit. Table 1 identifies deviations associated with any permit terms.
- Section C.18(f) requires the submittal of an annual report, 60 days after the end of the year, if the site is using “projected actual emissions” to show that a project is not a major modification. If applicable, this is submitted separately and is not a part of this quarterly report.
- Section C.19 requires various reports. When applicable, these are submitted separately.

Table 1: Deviations

Start Date	Cause Description	Corrective Action Description	Deviation Site Condition Name	Number of Deviations	Incident Duration (days)
	N/A - continuous compliance in 3Q2024				

3. Section D - Facility Operation Conditions

3.1. Section D.1 – RESERVED

This section of the permit previously contained requirements for B110. The emitting units have all been removed. Therefore, all reporting for this permit section has been removed.

3.2. Section D.2 – RESERVED

This section of the permit previously contained requirements for B358. The emitting units have all been removed. Therefore, all reporting for this permit section has been removed.

3.3. Section D.3 – Building 302 High Bay Flex Space

D.3.6 requires a summary of information necessary to document compliance with D.3.1, D.3.2, and D.3.4, State BACT, PSD avoidance, and area source limits on VOC and HAPs, respectively. Emissions are shown in the following tables:

**Table 2: B302 High Bay Flex Space VOC Emission Summary
Monthly Determination of Compliance with VOC Limits of 24.9 (State BACT) and
35.2 (PSD) tons per twelve (12) consecutive month period**

	Sum for Month	Last 11 Months	12 Month Rolling Sum
	Tons	Tons	Tons
Jul 2024	0.0	0.0	0.0
Aug 2024	0.0	0.0	0.0
Sep 2024	0.0	0.0	0.0

**Table 3: B302 High Bay Flex Space HAP Emission Summary
Monthly Determination of Compliance with Total HAP (excluding ACN and MTBE)
Limits of 2.0 tons per twelve (12) consecutive month period**

	Sum for Month	Last 11 Months	12 Month Rolling Sum
	Tons	Tons	Tons
Jul 2024	0.0	0.0	0.0
Aug 2024	0.0	0.0	0.0
Sep 2024	0.0	0.0	0.0

**Table 4: B302 High Bay Flex Space VOC Emission Summary
Monthly Determination of Compliance with MTBE Limits of 0.5 tons per twelve
(12) consecutive month period**

	Sum for Month	Last 11 Months	12 Month Rolling Sum
	Tons	Tons	Tons
Jul 2024	0.0	0.0	0.0
Aug 2024	0.0	0.0	0.0
Sep 2024	0.0	0.0	0.0

VOC and HAP emitting operations have not commenced. This section of the permit is currently undergoing modification through significant source modification 48052.

3.4. Section D.4 – BHI and Synthetic Peptide Process Areas

This section of the permit contains no reporting requirements.

3.5. Section D.5 – Building 130 Complex Area

This section of the permit contains no reporting requirements.

3.6. Section D.6 – Spray Dryer System (ESD-01)

D.6.7 requires a summary of information necessary to document compliance with D.6.1 and D.6.2, State BACT and HAP minor limits on VOC and HAPs other than ACN and MTBE, respectively. Emissions are shown in the following table:

Table 5: ESD-01 VOC Emission Summary
Monthly Determination of Compliance with VOC Limit of 24 tpy (State BACT)

	Sum for Month	Last 11 Months	12 Month Rolling Sum
	Tons	Tons	Tons
Jul 2024	0.0	0.0	0.0
Aug 2024	0.0	0.0	0.0
Sep 2024	0.0	0.0	0.0

Table 6: ESD-01 HAP Emission Summary
Monthly Determination of Compliance with HAPs excluding ACN & MTBE Limit of 2.0 tpy

	Sum for Month	Last 11 Months	12 Month Rolling Sum
	Tons	Tons	Tons
Jul 2024	0.0	0.0	0.0
Aug 2024	0.0	0.0	0.0
Sep 2024	0.0	0.0	0.0

Table 7: ESD-01 HAP Emission Summary
Monthly Determination of Compliance with MTBE Limit of 1.0 tpy

	Sum for Month	Last 11 Months	12 Month Rolling Sum
	Tons	Tons	Tons
Jul 2024	0.0	0.0	0.0
Aug 2024	0.0	0.0	0.0
Sep 2024	0.0	0.0	0.0

VOC and HAP emitting operations from ESD-01 had not commenced as of the end of 3Q2024. This spray dryer will not be constructed and will be removed in permit 48052, currently pending at IDEM OAO.

3.7. Section D.7—Architectural and Industrial Maintenance (AIM) Coatings

This section of the permit contains no reporting requirements.

3.8. Section D.8—Specifically Regulated Insignificant Activities (HVAC Units)

This section of the permit contains no reporting requirements.

4. Section E--Emissions Unit Operation Conditions

4.1. Section E.1 – Emergency Generators and Fire Pumps: RICE MACT (40 CFR 63, Subpart ZZZZ)

Section E.1 does not contain a quarterly reporting requirement. Separate notice must be provided of the acquisition and startup of certain sizes and types of engines.

4.2. Section E.2 – Emergency Generators and Fire Pumps (40 CFR 60, Subpart IIII)

Currently, no reporting requirement of 40 CFR 60, Subpart IIII applies to LTC.

4.3. Section E.3 – RESERVED

Section E.3 is Reserved with no reporting requirements.

4.4. Section E.4 – RESERVED

Condition E.4 is Reserved with no reporting requirements.

4.5. Section E.5 – RESERVED

Condition E.5 is Reserved with no reporting requirements.

4.6. Section E.6 – Benzene Waste NESHAP Conditions

Condition E.6 requires a report to be submitted only if the amount of benzene waste from chemical manufacturing increases to above 1 metric ton per calendar year.

- No report is required at this time.

5. Section F--Emissions Unit Operation Conditions

5.1. Section F.1.9 – LTC HAP Reporting Requirements

Condition F.1.9 requires a report to be submitted quarterly summarizing the emissions calculations required under Conditions F.1.2, F.1.3, F.1.4, and F.1.5. The result of these emissions calculations document Lilly's compliance status with its area source limit found in Condition F.1.1. This Permit (097-41707-00072) became effective on 1-June-2021.

ACN emissions from Fugitive Components in Manufacturing:			
Month	Column 1	Column 2	Column 1 + Column 2
	This Month (Tons)	Previous 11 Months (Tons)	12 Month Total (Tons)
Jul 2024	0.01	2.06	2.07
Aug 2024	0.01	1.83	1.84
Sep 2024	0.03	1.55	1.59

ACN emissions from Components/Emissions Sources that are not Fugitive and not in Limited ACN Service (process vents, lab chemical usage, pilot plant operations, and tanks):			
Month	Column 1	Column 2	Column 1 + Column 2
	This Month (Tons)	Previous 11 Months (Tons)	12 Month Total (Tons)
Jul 2024	0.25	2.81	3.06
Aug 2024	0.36	2.84	3.20
Sep 2024	0.33	2.96	3.29

ACN emissions from Components in Limited ACN Service:			
Month	Column 1	Column 2	Column 1 + Column 2
	This Month (Tons)	Previous 11 Months (Tons)	12 Month Total (Tons)
Jul 2024	0.002	0.05	0.05
Aug 2024	0.002	0.05	0.05
Sep 2024	0.002	0.04	0.05

Total LTC ACN Emissions:			
Month	Column 1	Column 2	Column 1 + Column 2
	This Month (Tons)	Previous 11 Months (Tons)	12 Month Total (Tons)
Jul 2024	0.26	4.92	5.18
Aug 2024	0.37	4.73	5.10
Sep 2024	0.36	4.56	4.92

Due to rounding, values in tables may not be additive.

5.2. Section F.2.4 – LTC HAP Reporting Requirements

Condition F.2.4 requires a report to be submitted quarterly summarizing the emissions calculations required under Condition F.2.2. The result of these emissions calculations document Lilly’s compliance status with its area source limit found in Condition F.2.1. The Permit (097-45963-00072) became effective on 16-February-2023. MTBE-related Operations began in October 2023.

MTBE emissions from the B132B and B132C Drying Processes in Manufacturing:			
Month	Column 1	Column 2	Column 1 + Column 2
	This Month (Tons)	Previous 11 Months (Tons)	12 Month Total (Tons)
Jul 2024	0	0.092	0.092
Aug 2024	0.004	0.096	0.100
Sep 2024	0.004	0.100	0.104

Due to rounding, values in tables may not be additive.