

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
ABBOTT LABORATORIES' PROPOSED)
SITE-SPECIFIC AMENDMENT TO)
APPLICABILITY SECTION OF ORGANIC) R08-8
MATERIAL EMISSION STANDARDS AND) (Rulemaking – Air)
LIMITATIONS FOR THE CHICAGO AREA;)
SUBPART T: PHARMACEUTICAL)
MANUFACTURING (35 ILL. ADM. CODE)
218.480(b)))

NOTICE OF FILING

TO: Mr. John Therriault Kathleen M. Crowley
Assistant Clerk of the Board Hearing Officer
Illinois Pollution Control Board Illinois Pollution Control Board
100 West Randolph Street 100 West Randolph Street
Suite 11-500 Suite 11-500
Chicago, Illinois 60601 Chicago, Illinois 60601
(VIA ELECTRONIC MAIL) (VIA U.S. MAIL)

(PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board **ABBOTT LABORATORIES' MOTION TO FILE REVISED EXHIBIT 3 AND MINOR REVISION TO PROPOSED SUBSECTION 218.480(b)(4)**, a copy of which is herewith served upon you.

Respectfully submitted,

By: /s/ Katherine D. Hodge
Katherine D. Hodge

Dated: February 29, 2008

Katherine D. Hodge
Lauren C. Lurkins
HODGE DWYER ZEMAN
3150 Roland Avenue
Post Office Box 5776
Springfield, Illinois 62705-5776
(217) 523-4900

THIS FILING SUBMITTED ON RECYCLED PAPER

CERTIFICATE OF SERVICE

I, Katherine D. Hodge, the undersigned, hereby certify that I have served

**ABBOTT LABORATORIES' MOTION TO FILE REVISED EXHIBIT 3 AND
MINOR REVISION TO PROPOSED SUBSECTION 218.480(b)(4) upon:**

Mr. John Therriault
Assistant Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

via electronic mail on February 29, 2008; and upon:

Kathleen M. Crowley
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Matthew J. Dunn, Chief
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Assistant Counsel
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1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Office of Legal Services
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, Illinois 62702-1271

by depositing said document in the United States Mail, postage prepaid, in Springfield,
Illinois on February 29, 2008.

/s/ Katherine D. Hodge
Katherine D. Hodge

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**ABBOTT LABORATORIES'
MOTION TO FILE REVISED EXHIBIT 3 AND
MINOR REVISION TO PROPOSED SUBSECTION 218.480(b)(4)**

NOW COMES ABBOTT LABORATORIES (“Abbott”), by and through its attorneys, HODGE DWYER ZEMAN, and hereby requests the Illinois Pollution Control Board (“Board”) to accept for filing Abbott’s Revised Exhibit 3 and Minor Revision to proposed 35 Ill. Admin. Code Subsection 218.480(b)(4). In support of this Motion, Abbott states as follows:

1. Abbott filed its original Proposal of Amendments to 35 Ill. Admin. Code Part 218.480(b) (“Original Proposal of Amendments”) with the Board on September 4, 2007.

2. Abbott’s Original Proposal of Amendments included: 1) the Proposed Amendments; 2) the Statement of Reasons; 3) Appearances for the attorneys representing Abbott; 4) a Motion to Waive Requirement to Submit 200 Signatures; 5) a Motion for Expedited Review; 6) Exhibit 1, Aerial Photograph of Abbott Park and Vicinity, Libertyville Township, Illinois; 7) Exhibit 2, Improving Air Quality with Economic Incentive Programs, United States Environmental Protection Agency, January 2001; and

8) Exhibit 3, a table entitled "Historical VOM Air Emissions from Tunnel Dryers and Fluid Bed Dryers at the Abbott Park Facility."

3. Since filing its Original Proposal of Amendments, Abbott has discovered that several revisions and clarifications were necessary to Exhibit 3, the table entitled "Historical VOM Air Emissions from Tunnel Dryers and Fluid Bed Dryers at the Abbott Park Facility."

4. Therefore, Abbott seeks to file Revised Exhibit 3 with the Board that includes the following changes: 1) correct a typographical error for the 1999 total, changing 26.1 to 25.1; 2) show single-unit data at 2 decimal places; 3) add a line for 90% of the baseline, with the corrected value of 20.6 tons per year; 4) add Note c to identify the round-off issue and specify that totals are correct based on calculations with more significant figures; and 5) update the reference in Note a to reflect the correct condition in the renewed CAAPP Permit, issued on September 26, 2007.

5. In addition, Abbott also seeks to file a minor revision to Proposed Section 218.480(b)(4) to reflect the change made to the 90% baseline calculation, as follows:

- 4) For fluid bed dryers #1, #2, and #3 and for tunnel dryers #1, #2, #3 and #4, the combined total annual emissions from the dryers listed in this subsection 218.480(b)(4) shall not exceed ~~18,779~~ **18,688** kg/year (~~20.7~~ **20.6** tons/year). [BOARD NOTE: tunnel dryers are otherwise referred to as warm air dryers]; and

* * *

WHEREFORE, for the above and foregoing reasons, ABBOTT LABORATORIES hereby respectfully requests the Illinois Pollution Control Board to accept for filing ABBOTT LABORATORIES' Revised Exhibit 3 and Minor Revision to Proposed Subsection 218.480(b)(4).

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/Katherine D. Hodge
One of Its Attorneys

Date: February 29, 2008

Katherine D. Hodge
Lauren C. Lurkins
HODGE DWYER ZEMAN
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ABOT:003/Filings/NOF Motion to file Revised Exhibit 3 and Amended Proposal

Revised Exhibit 3 (2/29/08)

Historical VOM Air Emissions from Tunnel Dryers and Fluid Bed Dryers at the Abbott Park Facility ^a
(tons per year) ^c

Year	Tunnel Dryer 1	Tunnel Dryer 2	Tunnel Dryer 3	Tunnel Dryer 4	Fluid Bed Dryer 1	Fluid Bed Dryer 2	Fluid Bed Dryer 3	Total Tunnel Dryer Emissions	Total Fluid Bed Dryer Emissions	Total Dryer VOM Emissions
1998	2.65	2.19	2.59	3.27	1.34	1.12	b	10.7	2.5	13.2
1999	4.52	5.58	5.31	5.16	2.35	2.15	b	20.6	4.5	25.1
2000	3.79	4.01	3.15	3.30	3.16	3.16	0.17	14.2	6.5	20.7
2001	0.70	1.60	1.70	1.30	1.70	1.60	1.70	5.3	5.0	10.3
2002	1.80	1.80	1.80	1.20	0.90	0.90	3.10	6.6	4.9	11.5
2003	2.40	2.10	2.20	1.20	1.00	1.00	2.90	7.9	4.9	12.8
2004	3.40	1.70	1.50	0.60	0.00	0.00	3.90	7.2	3.9	11.1
2005	2.10	1.50	1.20	0.00	0.10	0.10	3.00	4.8	3.2	8.0
2006	1.00	1.11	0.91	0.00	0.66	0.66	2.97	3.0	4.3	7.3
2007	1.71	0.69	1.03	0.00	0.41	0.41	3.19	3.4	4.0	7.5
Average of Years 1999 & 2000 (baseline)										22.9
90 Percent of Baseline										20.6

Notes to Exhibit 3

a Emissions of VOM were calculated based on records of production batches, corresponding VOM content of the batch, and specified loss factors for the respective equipment, as detailed in CAAPP Permit Section 7.1.12(e).

b Fluid Bed Dryer 3 was not operating prior to 2000.

c Some data were included in calculations to more precision than one decimal place, which can result in apparent discrepancies for total emissions. Total emissions are calculated with available precision and rounded to one decimal place.