



JANSSEN ORTHO LLC

June 16, 2008

Via e-mail
ptrack@indecon.com

David
US Environmental Protection Agency
P-Track

RE: Performance Track APR
Janssen Ortho A020020
2007 APR Review

Dear David;

In response to your communication via electronic mail, see below a detailed description of the basis for the calculation of the air emissions reported for the baseline year (2006) and the progress on the following year (2007).

Both, the baseline year and the 2007 data consider the following emission units:
On the Janssen I site:

- Boiler 250 HP
- Boiler 500 HP (1)
- Boiler 500 HP (2)
- Emergency Generator 2,220 HP (1)
- Emergency Generator 2,220 HP (2)
- Emergency Generator 2,220 HP (3)
- Emergency Generator 2,220 HP (4)
- Emergency Generator 1, 200 HP
- Oros Production

On the Janssen II site:

- Boiler 150 HP (1)
- Boiler 150 HP (2)
- Emergency Generator 1,135 HP
- Emergency Generator 2,011 HP (1)
- Emergency Generator 2,011 HP (2)
- Emergency Generator 2,011 HP (3)

NOTE: At present the following projects are under construction/startup:
Concerta (Vicodin) & Project Parent. The emissions units associated of these two projects are not considered in this report.

Goal 2: REDUCE FACILITY'S SOX EMISSIONS

The basis for the calculation of SOx emissions reduction considered the actual hours of operation on each air emission unit listed above. It also considered the actual sulphur content on diesel burned. The sulphur content is obtained from the analytical results that are received from the supplier on each diesel truck. A yearly average of the sulphur content has been used for the purpose of this report.

On baseline year (2006) the average sulphur content was:

For Jansesn I site: 0.0652%

For Janssen II site: 0.0715%

On year 2007 the average sulphur content was:

For Jansesn I site: 0.00825%

For Janssen II site: 0.00933%

The SOx emission on the baseline year were: 7.95 tons per year; on year 2007 were: 1.02 tons. This represents a reduction of 87.2 %.

Goal 3: REDUCE FACILITY'S NOX EMISSIONS

The basis for the calculation of NOx emission reduction recognized the installation of Selective Catalytic Reductor (SCR) at three of the four Emergency Generator of 2,220 HP in Janssen. Reduction on NOx, based on manufacturer specification and field observations is 90% for each of those units. Therefore, the annual emissions calculated using the emission factors has been calculated times 10% to obtain the actual discharge. The NOx emission also considered the actual hours of operation.

The three units were installed in 2007.

The NOx emission on the baseline year were: 24.18 tons per year; on year 2007 were: 22.52 tons. This represents a reduction of 7 %.

Enclosed you'll find four tables that summarizes the actual emissions of each of the above-mentioned air emission unit based on the explanations given. After reviewing them we have concluded that the data for the baseline year shall not be changed. We are only updating the P-track 2007 report to review the emissions of that year based on the above-mentioned criteria.

Should you have any question please feel free to contact me at 787-272-7413.

Cordially,



Sandy Casillas

Janssen Ortho LLC
 Gurabo, Puerto Rico

Utilities
 Air Emissions Calculations Janssen I
 2006

Janssen I						
Utilities	PM-10	SOx	CO	NOx	VOC	HAP
BOILER 1 (250)	0.2644	1.2412	0.6610	2.6440	0.0334	0.0054
BOILER 2 (500)	0.5962	2.7988	1.4905	5.9621	0.0752	0.0121
BOILER 3 (500)	0.3476	1.6317	0.8690	3.4759	0.0438	0.0071
Generator 2220 hp	0.0157	0.0103	0.1330	0.5009	0.0145	0.0002
Generator 2220 hp	0.0131	0.0086	0.1114	0.4195	0.0122	0.0002
Generator 2220 hp	0.0138	0.0091	0.1170	0.4405	0.0128	0.0002
Generator 2220 hp	0.0236	0.0156	0.2007	0.7557	0.0219	0.0004
GENERATOR 1200 (Pharma I)	0.0396	0.0261	0.3369	1.2684	0.0368	0.0006
Emissions Sub-total	1.3140	5.7414	3.9196	15.4670	0.2507	0.0262

This data is considered baseline (year 2006). It considered the actual hours of operation on each air emission unit listed above. It also considered the actual sulphur content burn on each unit. The sulphur content was obtained from the analytical laboratory analysis conducted to each diesel cargo received at the facility. On year 2006 the average sulphur content in Janssen I was 0.0652%.

Janssen Ortho LLC
Gurabo, Puerto Rico

Utilities
Air Emissions Calculations Janssen I I
2006

Janssen II						
Utilities	PM-10	SOx	CO	NOx	VOC	HAP
BOILER 1 (150 HP)	0.2357	1.2136	0.5894	2.3574	0.0297	0.0048
BOILER 2 (150 HP) - Alternate with Boiler I	0.1881	0.9683	0.4702	1.8809	0.0237	0.0038
Generator 1135 hp	0.0137	0.0099	0.1165	0.4387	0.0127	0.0002
Generator 2011 hp	0.0050	0.0036	0.0425	0.1601	0.0046	0.0001
Generator 2011 hp	0.0098	0.0071	0.0832	0.3134	0.0091	0.0001
Generator 2011 hp	0.0154	0.0112	0.1312	0.4941	0.0143	0.0002
Emissions Sub-total	0.4678	2.2136	1.4331	5.6446	0.0943	0.0093

This data is considered baseline (year 2006). It considered the actual hours of operation on each air emission unit listed above. It also considered the actual sulphur content burn on each unit. The sulphur content was obtained from the analytical laboratory analysis conducted to each diesel cargo received at the facility. On year 2006 the average sulphur content in Janssen II was 0.0715%.

Janssen Ortho LLC.
Gurabo, Puerto Rico

OROS Air Emissions
2006

OROS Projected Emissions						
Production (OROS)	PM-10	SOx	CO	NOx	VOC	OTHER
OROS (PRODUCCION)	0.0878	-	-	3.0747	0.1098	-
Emissions Sub-total	0.0878	-	-	3.0747	0.1098	-

Janssen Ortho LLC
Gurabo, Puerto Rico

Utilities
Air Emissions Calculations Janssen I
2007

Janssen I						
Utilities	PM-10	SOx	CO	NOx	VOC	HAP
BOILER 1 (250)	0.2326	0.1382	0.5815	2.3259	0.0293	0.0047
BOILER 2 (500)	0.2646	0.1572	0.6615	2.6462	0.0334	0.0054
BOILER 3 (500)	0.7237	0.4299	1.8093	7.2373	0.0913	0.0147
Generator 2220 hp	0.0310	0.0026	0.2631	0.0990	0.0287	0.0005
Generator 2220 hp	0.0433	0.0036	0.3677	0.1384	0.0402	0.0006
Generator 2220 hp	0.0387	0.0032	0.3287	0.1238	0.0359	0.0006
Generator 2220 hp	0.0225	0.0019	0.1909	0.7188	0.0209	0.0003
GENERATOR 1200 (Pharma I)	0.0117	0.0010	0.0997	0.3752	0.0109	0.0002
Emissions Sub-total	1.3680	0.7375	4.3025	13.6646	0.2906	0.0271

This data pertains to year 2007. It considered the actual hours of operation on each air emission unit listed above. It also considered the actual sulphur content burn on each unit. The sulphur content was obtained from the analytical laboratory analysis conducted to each diesel cargo received at the facility. An average of all results has been used for the purpose of this report. On year 2007 the average sulphur content in Janssen I was 0.00825%.

This data, in addition, recognized a 90% Nox emission reduction after the installation of Selective Catalytic Reductor (SCR) at three of the four 2200 Generators.

Janssen Ortho LLC
 Gurabo, Puerto Rico

Utilities
 Air Emissions Calculations Janssen I I
 2007

Janssen II						
Utilities	PM-10	SOx	CO	NOx	VOC	HAP
BOILER 1 (150 HP)	0.2231	0.1499	0.5577	2.2308	0.0281	0.0045
BOILER 2 (150 HP) - Alternate with Boiler I	0.1951	0.1311	0.4878	1.9513	0.0246	0.0040
Generator 1135 hp	0.0267	0.0025	0.2268	0.8537	0.0248	0.0004
Generator 2011 hp	0.0079	0.0007	0.0668	0.2516	0.0073	0.0001
Generator 2011 hp	0.0077	0.0007	0.0656	0.2470	0.0072	0.0001
Generator 2011 hp	0.0077	0.0007	0.0656	0.2470	0.0072	0.0001
Emissions Sub-total	0.4682	0.2857	1.4704	5.7816	0.0992	0.0093

This data pertains to year 2007. It considered the actual hours of operation on each air emission unit listed above. It also considered the actual sulphur content burn on each unit. The sulphur content was obtained from the analytical laboratory analysis conducted to each diesel cargo received at the facility. An average of all results has been used for the purpose of this report. On year 2007 the average sulphur content in Janssen II was 0.00933%.

Janssen Ortho LLC.
Gurabo, Puerto Rico

OROS Air Emissions
2007

OROS Projected Emissions						
Production (OROS)	PM-10	SOx	CO	NOx	VOC	OTHER
OROS (PRODUCCION)	0.0878	-	-	3.0747	0.1098	-
Emissions Sub-total	0.0878	-	-	3.0747	0.1098	-