



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/24/2013

Certified Mail

Mr. Chad Brenneman
PROCTER & GAMBLE MFG CO
3875 Reservoir Road
Lima, OH 45801

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0302020260
Permit Number: P0112748
Permit Type: Renewal
County: Allen

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Lima News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NWDO; Indiana

PUBLIC NOTICE
4/24/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

PROCTER & GAMBLE MFG CO
MUMAUGH & RESERVOIR RD,
Lima, OH 45802
Allen County

FACILITY DESC.: Soap and Other Detergent Manufacturing

PERMIT #: P0112748

PERMIT TYPE: Renewal

PERMIT DESC: This is a permit renewal/modification application for three natural gas-fired boilers (B018, B019, and B021). The permittee is requesting federally enforceable limits on gas usage to reduce the facility-wide potential to emit in order to allow flexibility in the future to install other small, combustion sources and still maintain non-Title V status.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



Permit Strategy Write-Up
PROCTER & GAMBLE MFG CO
Permit Number: P0112748
Facility ID: 0302020260



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Procter and Gamble is a detergent production facility located in Lima, Ohio. The company has a significant amount of natural gas fired equipment that is associated with this manufacturing process.

3. Facility Emissions and Attainment Status:

Procter and Gamble is located in Allen County and is classified as a “Synthetic Minor Facility” for permitting requirements. Some of the existing natural gas fired equipment has federally enforceable restrictions in place which limit the facilities potential emissions to less than 100 tons per year of Nitrogen Oxides and Carbon Monoxide. Allen County is currently in attainment for all criteria pollutants.

4. Source Emissions:

The company has proposed to restrict emissions on 3 boilers existing at the plant to maintain the permitting flexibility of the current and future plant operations. The proposal requests a limitation on fuel usage for the purpose of reducing potential NOx and CO emissions.

5. Conclusion:

As part of the company’s strategy to maintain its “non- major” status for Title V permitting applicability, this PTIO will incorporate federally enforceable permit conditions to include these emission units into the facilities current restrictions. Therefore, there will be no change in the status of this facility.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	13.3
NOx	17.3



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
PROCTER & GAMBLE MFG CO**

Facility ID:	0302020260
Permit Number:	P0112748
Permit Type:	Renewal
Issued:	4/24/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate
for
PROCTER & GAMBLE MFG CO**

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Draft Permit-to-Install and Operate

PROCTER & GAMBLE MFG CO

Permit Number: P0112748

Facility ID: 0302020260

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0302020260
Application Number(s): A0046415
Permit Number: P0112748
Permit Description: This is a permit renewal/modification application for three natural gas-fired boilers (B018, B019, and B021). The permittee is requesting federally enforceable limits on gas usage to reduce the facility-wide potential to emit in order to allow flexibility in the future to install other small, combustion sources and still maintain non-Title V status.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/24/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

PROCTER & GAMBLE MFG CO
MUMAUGH & RESERVOIR RD
Lima, OH 45802

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0112748

Permit Description: This is a permit renewal/modification application for three natural gas-fired boilers (B018, B019, and B021). The permittee is requesting federally enforceable limits on gas usage to reduce the facility-wide potential to emit in order to allow flexibility in the future to install other small, combustion sources and still maintain non-Title V status.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	B021
Company Equipment ID:	Boiler #3A
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: 25.7 mmBtu/hr boilers

Emissions Unit ID:	B018
Company Equipment ID:	Boiler 1A
Superseded Permit Number:	03-13924
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B019
Company Equipment ID:	Boiler 2A
Superseded Permit Number:	P0086688
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0112748
Facility ID: 0302020260
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0112748
Facility ID: 0302020260
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

PROCTER & GAMBLE MFG CO

Permit Number: P0112748

Facility ID: 0302020260

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Draft Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0112748
Facility ID: 0302020260
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. B021, Boiler #3A

Operations, Property and/or Equipment Description:

16.75 mmBtu/hr natural gas fired boiler, (Boiler #3A)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1) and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	2.18 lbs nitrogen oxides (NOx)/hr 1.68 lbs carbon monoxide (CO)/hr 0.12 lb particulate emissions (PE)/hr Visible particulate emissions (PE) shall not exceed 10% opacity, as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(D)	<u>For emissions units B018, B019, and B021, combined:</u> 17.3 tons NOx/rolling 12-month period 13.3 tons CO/rolling 12-month period 0.9 tons PE/rolling 12-month period



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b.
c.	OAC rule 3745-17-10(B)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-18-06	See b)(2)d.
f.	40 CFR, Part 60, Subpart Dc	Recordkeeping requirements See d)(1)a.

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirements for these emissions units have been determined to be compliance with the terms and conditions of this permit. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with 40 CFR, Part 60, Subpart Dc.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(1):
 - i. 17.3 tons NOx/rolling 12-month period;
 - ii. 13.3 tons CO/rolling 12-month period; and
 - iii. 0.9 tons PE/rolling 12-month period.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The emissions units are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).

c) Operational Restrictions

- (1) The maximum annual natural gas usage for emissions units B018, B019, and B021 combined shall not exceed 266.3 million cubic feet (mmscf) per year, based upon a rolling 12-month summation of the monthly fuel usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the fuel usage levels specified in the following table:

Month	Maximum Allowable Cumulative Fuel Usage (mmscf)
1	25
1-2	50



Month	Maximum Allowable Cumulative Fuel Usage (mmscf)
1-3	75
1-4	100
1-5	125
1-6	150
1-7	170
1-8	190
1-9	210
1-10	230
1-11	250
1-12	266.3

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the monthly fuel usage.

(2) The permittee shall burn only pipeline quality natural gas in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. the natural gas usage for each month, in mmscf;
- b. for the first 12 calendar months of operation following the issuance of this permit, the cumulative natural gas usage, in mmscf;
- c. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the natural gas usage, in mmscf;
- d. the calculated emissions of NO_x, CO, and PE, in tons; and
- e. the rolling, 12-month NO_x, CO, and PE emissions, in tons.

(2) For each day during which the permittee burns a fuel other than pipeline quality natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative fuel usage levels; and
 - ii. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month natural gas usage limitation of 266.3 mmscf; and
 - iii. the rolling, 12-month NO_x, CO, and PE emission limitations.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

These quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

2.18 lbsNO_x/hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.13 lbNO_x/mmBtu by the maximum heat input of 16.75 mmBtu/hr. If required, the permittee shall demonstrate compliance



by testing in accordance with Methods 1 – 4 and 7 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

1.68 lbs CO/hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the vendor supplied emission factor of 0.1 lb CO/mmBtu by the maximum heat input of 16.75 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 10 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

0.12 lb PE/hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the vendor supplied emission factor of 0.007 lb PE/mmBtu by the maximum heat input of 16.75 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitations:

17.3 tons NO_x/rolling 12-month period

13.3 tons CO/rolling 12-month period

0.9 tons PE/rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling, 12-month emission limitations shall be demonstrated through the record keeping requirements in section d)(1) of the terms and conditions of this permit.

e. Emission Limitation:

Visible PE shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation using U.S. EPA Method 9, which is located in 40 CFR, Part 60, Appendix A.



Draft Permit-to-Install and Operate

PROCTER & GAMBLE MFG CO

Permit Number: P0112748

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g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group -25.7 mmBtu/hr boilers: B018,B019,

EU ID	Operations, Property and/or Equipment Description
B018	25.7 mmBtu/hr natural gas fired boiler (Boiler 1A)
B019	25.7 mmBtu/hr natural gas fired boiler (Boiler 2A)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1) and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>For emissions units B018 and B019 individually:</u> 3.34 lbs nitrogen oxides (NOx)/hr 2.57 lbs carbon monoxide (CO)/hr 0.18 lb particulate emissions (PE)/hr Visible particulate emissions (PE) shall not exceed 10% opacity, as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(D)	<u>For emissions units B018, B019, and B021 combined:</u> 17.3 tons NOx/rolling, 12-month period



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		13.3 tons CO/rolling, 12-month period 0.9 tons PE/rolling, 12-month period See b)(2)b.
c.	OAC rule 3745-17-10(B)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-18-06	See b)(2)d.
f.	40 CFR, Part 60, Subpart Dc	Recordkeeping requirements See d)(1)a.

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirements for these emissions units have been determined to be compliance with the terms and conditions of this permit. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with 40 CFR, Part 60, Subpart Dc.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(1):
 - i. 17.3 tons NOx/rolling 12-month period;
 - ii. 13.3 tons CO/rolling 12-month period; and
 - iii. 0.9 ton PE/rolling 12-month period.
- c. The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The emissions units are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).

c) Operational Restrictions

- (1) The maximum annual natural gas usage for emissions units B018, B019, and B021 combined shall not exceed 266.3 million cubic feet (mmscf) per year, based upon a rolling 12-month summation of the monthly fuel usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the fuel usage levels specified in the following table:



Month	Maximum Allowable Cumulative Fuel Usage (mmscf)
1	25
1-2	50
1-3	75
1-4	100
1-5	125
1-6	150
1-7	170
1-8	190
1-9	210
1-10	230
1-11	250
1-12	266.3

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the monthly fuel usage.

(2) The permittee shall burn only pipeline quality natural gas in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. the natural gas usage for each month, in mmscf;
- b. for the first 12 calendar months of operation following the issuance of this permit, the cumulative natural gas usage, in mmscf;
- c. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the natural gas usage, in mmscf;
- d. the calculated emissions of NO_x, CO, and PE, in tons; and
- e. the rolling, 12-month NO_x, CO, and PE emissions, in tons.

(2) For each day during which the permittee burns a fuel other than pipeline quality natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the



potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative fuel usage levels; and
 - ii. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month natural gas usage limitation of 266.3 mmscf; and
 - iii. the rolling, 12-month NO_x, CO, and PE emission limitations.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

These quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.34 lbsNO_x/hour



Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.13 lbNO_x/mmBtu by the maximum heat input of 25.7 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 7 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

2.57 lbs CO/hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.1 lb CO/mmBtu by the maximum heat input of 25.7 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 10 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

0.18 lb PE/hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.007 lb PE/mmBtu by the maximum heat input of 25.7 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitations:

17.3 tons NO_x/rolling 12-month period

13.3 tons CO/rolling 12-month period

0.9 tons PE/rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limitations shall be demonstrated through the record keeping requirements in section d)(1) of the terms and conditions of this permit.

e. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a 6-minute average.



Draft Permit-to-Install and Operate

PROCTER & GAMBLE MFG CO

Permit Number: P0112748

Facility ID: 0302020260

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation using U.S. EPA Method 9, which is located in 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.