

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

11/27/2013

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0302020260
Permit Number: P0115810
Permit Type: Renewal
County: Allen

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



FINAL

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

Facility ID:	0302020260
Permit Number:	P0115810
Permit Type:	Renewal
Issued:	11/27/2013
Effective:	11/27/2013
Expiration:	11/27/2018



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

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Final Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0115810
Facility ID: 0302020260
Effective Date: 11/27/2013

Authorization

Facility ID: 0302020260
Application Number(s): A0049009, A0049010, A0049011, A0049229, A0049231, A0049237
Permit Number: P0115810
Permit Description: Renewal PTIO for sixteen storage tanks and a dry material handling system.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 11/27/2013
Effective Date: 11/27/2013
Expiration Date: 11/27/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

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.

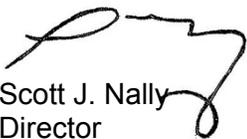
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0115810

Permit Description: Renewal PTIO for sixteen storage tanks and a dry material handling system.

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

Emissions Unit ID: P017
 Company Equipment ID: Dry Materials Handling System
 Superseded Permit Number: P0107847
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T085
 Company Equipment ID: Tank 3830
 Superseded Permit Number: P0107347
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T099
 Company Equipment ID: Storage Tank #604
 Superseded Permit Number: P0086691
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T104
 Company Equipment ID: Tk 5933
 Superseded Permit Number: P0106279
 General Permit Category and Type: Not Applicable

Group Name: A

Emissions Unit ID:	T110
Company Equipment ID:	New Storage Tank #513
Superseded Permit Number:	P0115388
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T111
Company Equipment ID:	New Storage Tank #514
Superseded Permit Number:	P0115388
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T112
Company Equipment ID:	New Storage Tank #516
Superseded Permit Number:	P0115388
General Permit Category and Type:	Not Applicable

Group Name: B

Emissions Unit ID:	T051
Company Equipment ID:	Storage Tank#519
Superseded Permit Number:	P0115388
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T052
Company Equipment ID:	Storage Tank#520
Superseded Permit Number:	P0115388
General Permit Category and Type:	Not Applicable



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Emissions Unit ID:	T075
Company Equipment ID:	Storage Tank#515
Superseded Permit Number:	P0115388
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T077
Company Equipment ID:	Storage Tank #517
Superseded Permit Number:	P0115388
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T078
Company Equipment ID:	Storage Tank#518
Superseded Permit Number:	P0115388
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T096
Company Equipment ID:	Storage Tank#521
Superseded Permit Number:	P0115388
General Permit Category andType:	Not Applicable

Group Name: C

Emissions Unit ID:	T106
Company Equipment ID:	Tank 9557
Superseded Permit Number:	P0108672
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T107
Company Equipment ID:	Tank 9554 (incorrectly identified as 9559)
Superseded Permit Number:	P0108672
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T108
Company Equipment ID:	Tank 9560
Superseded Permit Number:	P0108672
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T109
Company Equipment ID:	Tank 9563
Superseded Permit Number:	P0108672
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0115810
Facility ID: 0302020260
Effective Date: 11/27/2013

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 submitting 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 emission 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.



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.



Final Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0115810
Facility ID: 0302020260
Effective Date: 11/27/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0115810
Facility ID: 0302020260
Effective Date: 11/27/2013

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



Final Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0115810
Facility ID: 0302020260
Effective Date: 11/27/2013

C. Emissions Unit Terms and Conditions



1. P017, Dry Material Handling System

Operations, Property and/or Equipment Description:

LFC Dry Material Handling System with Baghouses

- c) 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. None.
- d) 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(F)	0.43 lb of particulate matter less than 10 microns (PM10)/hour 1.88 tons of PM10/year Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from each baghouse stack See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05 (A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-17-11(B)	See b)(2)d.



(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require the use of two baghouses:

- i. 0.43 PM10/hour;
- ii. 1.88 ton PM10/year;
- iii. Visible PE shall not exceed 5 % opacity, as a six-minute average

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective November 30, 2001, for two specific purposes as indicated below:

- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
- ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)c.].

The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.



The BAT requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the emissions of PM₁₀ since the potential to emit, taking into account the voluntary restriction on the use of the baghouses, is less than 10 tons per year.

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

e) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE: [See b)(2)a.]

a. This emissions unit shall be vented to two baghouses capable of achieving a maximum outlet concentration of 0.02 grain of PM₁₀/dscf.

f) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

g) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in section d)(1) above:

a. All days during which any visible emissions were observed from the stacks serving this emissions unit.

b. Any corrective actions taken to eliminate the visible particulate emissions.



- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

h) 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
0.02 grain of PM₁₀/dscf

Applicable Compliance Method

The 0.02 grain of PM₁₀/dscf emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading concentration for the baghouses. If required, the permittee shall demonstrate compliance with the gr PM₁₀/dscf emission limitation in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201, 201A, and 202 of 40 CFR, Part 51, Appendix M.

- b. Emission Limitations
0.43 lb of PM₁₀/hour; 1.88 tons of PM₁₀/year

Applicable Compliance Methods

The hourly PM₁₀ limitation was established by summarizing the following:

Silo Baghouse: the maximum baghouse outlet concentration of 0.02 grain of PM₁₀/dscf was multiplied by the maximum volumetric air flow rate (1000 acfm), and conversion factors of 1 lb/7000 grains and 60 minutes/hour [0.17 lb/hour]

Receiver Baghouse: the maximum baghouse outlet concentration of 0.02 grain of PM₁₀/dscf was multiplied by the maximum volumetric air flow rate (1500 acfm), and conversion factors of 1 lb/7000 grains and 60 minutes/hour [0.26 lb/hour]

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures in Methods 1-4 of 40 CFR, Part 60 Appendix A and Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M.



The annual emission limitation was established by multiplying the hourly limitation by 8760 hours/year, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation

Visible PE shall not exceed 5% opacity, as a six minute average from each baghouse stack.

Applicable Compliance Method

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

i) Miscellaneous Requirements

(1) None.



2. T085, Tank 3830

Operations, Property and/or Equipment Description:

21,564 Gallon Offspec Laundry Detergent Fixed Roof Storage Tank (Tank 3830).

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. b)(1)d., d)(2).

(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. None

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), as effective 11/30/01	0.03 ton of organic compounds (OC)/year See b)(2)(a).
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(L)	See b)(2)c.
d.	ORC 3704.04(F) OAC rule 3745-114-01	See d)(2).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), effective 11/30/01, have been determined to be the following:

- i. use of splash fill;
- ii. 0.03 ton of OC/year; and
- iii. compliance with the terms and conditions of this permit.



b. The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit for OC emissions is less than 10 tons/year.

d. The storage tank does not store or hold a petroleum liquid (as defined in OAC rule 3745-21-01) and, as such, OAC rule 3745-21-09(L) is not applicable.

c) Operational Restrictions

(1) The permittee shall not exceed a maximum annual material throughput rate of 4,543,000 gallons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the amount (in gallons per month and total gallons, to date, for the calendar year) of material throughput for this emissions unit.

(2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the maximum annual emissions for each toxic air contaminant (from T085), as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires the permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes to the emissions unit, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio



EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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
0.03 ton of OC/year

Applicable Compliance Method

Compliance with the annual OC limitation is based on a maximum annual throughput of offspec laundry detergent, U.S. EPA's TANKS version 4.0.9d, and breathing and working losses calculated in accordance with AP-42 Section 7.1.3.1 (11/06).

g) Miscellaneous Requirements

(1) None.



3. T099, Storage Tank #604

Operations, Property and/or Equipment Description:

36,000 Gallon Dilute Fabric Softener Fixed Roof Storage Tank

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. None

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)	0.10 ton of organic compounds (OC)/year
b.	OAC rule 3745-21-09(L)	See b)(2)b.
c.	<u>40 CFR Part 60, Subpart Kb</u> 40 CFR Part 60.116b(a) & (b)	See d)(1)

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the recordkeeping requirements of 40 CFR, Part 60, Subpart Kb.

b. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01 (E)(13).

c) Operational Restrictions

(1) None



d) Monitoring and/or Recordkeeping Requirements

- (1) In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of this emissions unit shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the emissions unit.
- (2) The permittee shall maintain monthly records of the amount (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

0.10 ton of OC/year

Applicable Compliance Method:

Compliance with the annual OC limitation is based on a maximum annual throughput of dilute fabric softener, U.S. EPA's TANKS version 4.0.9d, and breathing and working losses calculated in accordance with AP-42 Section 7.1.3.1 (11/06).



Final Permit-to-Install and Operate
PROCTER & GAMBLE MFG CO
Permit Number: P0115810
Facility ID: 0302020260
Effective Date: 11/27/2013

g) Miscellaneous Requirements

(1) None.



4. T104, Tank 5933

Operations, Property and/or Equipment Description:

2,879 Gallon Fixed Roof Storage Tank #5933

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. None

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 3475-31-05(A)(3), as effective 11/30/01	0.10 ton of volatile organic compounds (VOC)/year See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-21-09(L)	See b)(2)d.
d.	40 CFR, Part 60, Subpart Kb	See b)(2)e.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements for this emission unit have been determined to be compliance with the terms and conditions of this permit.

b. The permittee has satisfied BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year.



However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than 10 tons/year.

The potential to emit for VOC emissions for this emissions unit is 0.10 ton per year and was determined by the use of the TANKS 4.0 program and a maximum throughput of 612,000 gallons per year.

- d. This rule does not apply to this emission unit because it does not store petroleum liquids as defined in OAC rule 3745-21-01(E)(15).
- e. This rule does not apply to this emission unit because it is less than 75 cubic meters (19,813 gallons) in size.

c) Operational Restrictions

- (1) The permittee shall not exceed a maximum annual material throughput rate of 612,000 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount (in gallons per month and total gallons, to date for the calendar year) of material throughput for this emission unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically



identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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
0.10 ton of VOC/year

Applicable Compliance Method

The permittee shall demonstrate compliance by calculations of tank working and breathing losses as determined by U.S. EPA TANKS 4.0 program and records of actual material throughput as required in section d)(1).

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group - A: T110, T111, and T112

EU ID	Operations, Property and/or Equipment Description
T110	36,000 Gallon Fixed Roof Active Surfactant Storage Tank
T111	36,000 Gallon Fixed Roof Active Surfactant Storage Tank
T112	36,000 Gallon Fixed Roof Active Surfactant Storage Tank

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. b)(1)f., b)(2)c., and d)(9).

(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. None.

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(F)	0.31 ton of volatile organic compounds (VOC)/year (from each tank) See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-09(L)	See b)(2)d.
e.	<u>40 CFR Part 60 Subpart Kb</u> 40 CFR Part 60.112b 40 CFR Part 60.113b 40 CFR Part 60.115b 40 CFR Part 60.116b	See b)(2)e. See d)(4) See d)(5) See d)(6) – d)(8)
f.	ORC rule 3704.04(F) OAC rule 3745-114-01	See d)(9)



(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The legally and practically enforceable emission limitations are based on the operational restrictions contained in c)(1) which require control equipment:

i. 0.31 ton of VOC/year (from each emissions unit)

- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(F). Therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit of VOC is less than 10 tons per year, taking into consideration the legally and practically enforceable requirements established under OAC rule 3745-31-05(F).

- d. The storage tanks in this permit do not store or hold a petroleum liquid as defined in OAC rule 3745-21-01. As such, OAC rule 3745-21-09(L) is not applicable.

- e. The storage tank shall be equipped with a closed vent system and control device meeting the following specifications:

i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR Part 60.485(b).



- ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE (see b)(2)a.):

- a. These emissions units shall be equipped with a closed vent system routed to a joint scrubber designed to reduce inlet VOC emissions by 95%.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range for the pressure drop across the scrubber and the liquid flow rate shall be based on the following manufacturer's specifications:

Pressure drop across the scrubber: 0.75 – 6.50 inches of water

Liquid flow rate: 1.20 – 3.00 gallons per minute

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the liquid flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

Whenever the monitored value for any parameter deviates from the ranges or minimum limits established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. The date and time the deviation began;
- b. The magnitude of the deviation at that time;
- c. The date the investigation was conducted;
- d. The name(s) of the personnel who conducted the investigation; and
- e. The findings and recommendations.

In response to each required investigation to determination the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable ranges, or at or above the minimum limits specified in this permit,



unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. A description of the corrective actions;
- g. The date the corrective action was completed;
- h. The date and time the deviation ended;
- i. The total period of time (in minutes) during which there was a deviation;
- j. The pressure drop and flow rate readings immediately after the corrective action was implemented; and
- k. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These ranges and/or limits for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted range for the pressure drop and/or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for these emissions units. In addition, approved revisions to the ranges or limits will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The owner or operator of the facility shall maintain records of the annual material throughput for each tank.
- (4) The owner or operator of each source that is equipped with a closed vent system and control device as required in 40 CFR Part 60.112b (a)(3) or (b)(2) (other than a flare) is exempt from the General Provisions of 40 CFR Part 60.8 and shall meet the following requirements:
 - a. Submit for approval by the Administrator as an attachment to the notification required by 40 CFR Part 60.7(a)(1) or, if the facility is exempt from 40 CFR Part 60.7(a)(1), as an attachment to the notification required by 40 CFR Part 60.7(a)(2), an operating plan containing the information listed below:
 - i. Documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed



pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

- ii. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
 - (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference – see 40 CFR 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
 - (b) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
- iii. For other liquids, the vapor pressure:
 - (a) May be obtained from standard reference texts; or
 - (b) Determined by ASTM Method 2879-83 (incorporated by reference – see 40 CFR Part 60.17); or
 - (c) Measured by an appropriate method approved by the Administrator; or
 - (d) Calculated by an appropriate method approved by the Administrator.

These records shall be maintained for at least two years in accordance with 40 CFR Part 60.116b(a) and (e).

- (9) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes to the emissions units that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual PER the following information concerning the operations of the wet scrubber during the 12-month reporting period for these emissions units:
 - a. Each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;
 - b. Any period of time (start time and date, and end time and date) when the emissions units were in operation and the process emissions were not vented to the scrubber;
 - c. Each incident of deviation described in e)(2)a. or e)(2)b. (above) where a prompt investigation was not conducted;
 - d. Each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action that would bring the pressure drop and/or liquid flow rate, into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
 - e. Each incident of deviation described in e)(2)a. or e)(2)b. where proper records were not maintained for the investigation and/or the corrective actions, as identified in the monitoring and recordkeeping requirements of this permit.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



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

0.31 ton of volatile organic compounds (VOC)/year (for each emissions unit)

Applicable Compliance Method

Compliance with the annual VOC limit is based on a maximum annual throughput* of active surfactant, U.S. EPA's TANKS version 4.0.9d, and the use of a scrubber designed to reduce inlet VOC emissions by 95%. Therefore, provided compliance is shown with the annual material throughput restriction, compliance with the annual emission limitation shall also be demonstrated.

* The maximum annual throughput is considered a trade secret and is contained as confidential information in the application.

g) Miscellaneous Requirements

(1) None.



6. Emissions Unit Group - B: T051, T052, T075, T077, T078, and T096

EU ID	Operations, Property and/or Equipment Description
T051	36,000 Gallon Fixed Roof Active Surfactant Storage Tank
T052	36,000 Gallon Fixed Roof Active Surfactant Storage Tank
T075	36,000 Gallon Fixed Roof Active Surfactant Storage Tank
T077	36,000 Gallon Fixed Roof Active Surfactant Storage Tank
T078	36,000 Gallon Fixed Roof Active Surfactant Storage Tank
T096	36,000 Gallon Fixed Roof Active Surfactant Storage Tank

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. b)(1)f., b)(2)c., and d)(4).

(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. None.

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(F)	0.31 ton of volatile organic compounds (VOC)/year (from each tank) See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-09(L)	See b)(2)d.
e.	40 CFR Part 60 Subpart Kb	See b)(2)e.
f.	ORC rule 3704.04(F) OAC rule 3745-114-01	See d)(4)



(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The legally and practically enforceable emission limitations are based on the operational restrictions contained in c)(1) which require control equipment:

i. 0.31 ton of VOC/year (from each emissions unit)

- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(F). Therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit of VOC is less than 10 tons per year, taking into consideration the legally and practically enforceable requirements established under OAC rule 3745-31-05(F).

- d. The storage tanks in this permit do not store or hold a petroleum liquid as defined in OAC rule 3745-21-01. As such, OAC rule 3745-21-09(L) is not applicable.

- e. The storage tanks in this permit are not subject to 40 CFR Part 60 Subpart Kb because the construction of the tanks commenced prior to the applicability date specified in 60.110b(a). Additionally, this permit addresses a change in the material stored and does not constitute a modification in accordance with 40 CFR Part 60.14(e)(4).



c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE (see b)(2)a.):
 - a. These emissions units shall be equipped with a closed vent system routed to a joint scrubber designed to reduce inlet VOC emissions by 95%.

d) Monitoring and/or Recordkeeping Requirements

- (1) The owner or operator of the facility shall maintain records of the annual material throughput for each tank.
- (2) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range for the pressure drop across the scrubber and the liquid flow rate shall be based on the following manufacturer's specifications:

Pressure drop across the scrubber: 0.75 – 6.50 inches of water

Liquid flow rate: 1.20 – 3.00 gallons per minute

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the liquid flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

Whenever the monitored value for any parameter deviates from the ranges or minimum limits established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. The date and time the deviation began;
- b. The magnitude of the deviation at that time;
- c. The date the investigation was conducted;
- d. The name(s) of the personnel who conducted the investigation; and
- e. The findings and recommendations.

In response to each required investigation to determination the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable ranges, or at or above the minimum limits specified in this permit,



unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. A description of the corrective actions;
- g. The date the corrective action was completed;
- h. The date and time the deviation ended;
- i. The total period of time (in minutes) during which there was a deviation;
- j. The pressure drop and flow rate readings immediately after the corrective action was implemented; and
- k. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These ranges and/or limits for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted range for the pressure drop and/or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for these emissions units. In addition, approved revisions to the ranges or limits will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes to the emissions units that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



- (2) The permittee shall identify in the annual PER the following information concerning the operations of the wet scrubber during the 12-month reporting period for these emissions units:
 - a. Each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;
 - b. Any period of time (start time and date, and end time and date) when the emissions units were in operation and the process emissions were not vented to the scrubber;
 - c. Each incident of deviation described in e)(2)a. or e)(2)b. where a prompt investigation was not conducted;
 - d. Each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action that would bring the pressure drop and/or liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
 - e. Each incident of deviation described in e)(2)a. or e)(2)b. where proper records were not maintained for the investigation and/or the corrective actions, as identified in the monitoring and recordkeeping requirements of this permit.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



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

0.31 ton of VOC/year (from each emissions unit)

Applicable Compliance Method

Compliance with the annual VOC limit is based on a maximum annual throughput* of active surfactant, U.S. EPA's TANKS version 4.0.9d, and the use of a scrubber designed to reduce inlet VOC emissions by 95%. Therefore, provided compliance is shown with the annual material throughput restriction, compliance with the annual emission limitation shall also be demonstrated.

* The maximum annual throughput is considered a trade secret and is contained as confidential information in the application.

g) Miscellaneous Requirements

(1) None.



7. Emissions Unit Group - C: T106, T107, T108, and T109

EU ID	Operations, Property and/or Equipment Description
T106	3200 Gallon Indoor Storage Tank for Product Reblend Material (Tank 9557)
T107	3200 Gallon Indoor Storage Tank for Product Reblend Material (Tank 9559)
T108	3200 Gallon Indoor Storage Tank for Product Reblend Material (Tank 9560)
T109	3200 Gallon Indoor Storage Tank for Product Reblend Material (Tank 9563)

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. None.

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 3475-31-05(A)(3), as effective 11/30/01	0.10 ton of volatile organic compounds (VOC)/year from each emissions unit See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-21-09(L)	See b)(2)d.
d.	40 CFR, Part 60, Subpart Kb	See b)(2)e.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements for these emission units have been determined to be use of splash fill and compliance with the terms and conditions of this permit.

b. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006,



paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions since the uncontrolled potential to emit for VOC emissions is less than 10 tons/year for each emissions unit.

The potential to emit for each emissions unit is 0.10 ton of VOC per year and was determined by using the TANKS 4.09d program and a maximum throughput of 965,000 gallons per year for emissions unit.

- d. This rule does not apply to these emission units because these units do not store petroleum liquids as defined in OAC rule 3745-21-01(E)(15).
- e. This rule does not apply to these emission units because each tank has a capacity less than 75 cubic meters (19,813 gallons).

c) Operational Restrictions

- (1) The permittee shall not exceed a maximum annual material throughput rate of 965,000 gallons for each emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of material throughput (in gallons per month and total gallons, to date, for the calendar year) for each emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the



document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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
0.10 ton of VOC/year from each emissions unit

Applicable Compliance Method

Compliance with the annual VOC limitation is based on a maximum annual throughput of product reblend material, U.S. EPA's TANKS version 4.0.9d, and breathing and working losses calculated in accordance with AP-42 Section 7.1.3.1 (11/06).

g) Miscellaneous Requirements

(1) None.