



12/3/2013

Certified Mail

JACKIE HOLTON
Armaly Brands, LLC
110 W FIRST ST
LONDON, OH 43140

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| Yes | 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: 0149010008
Permit Number: P0106077
Permit Type: Renewal
County: Madison

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, Central District Office at (614)728-3778 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-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Armaly Brands, LLC**

| | |
|----------------|------------|
| Facility ID: | 0149010008 |
| Permit Number: | P0106077 |
| Permit Type: | Renewal |
| Issued: | 12/3/2013 |
| Effective: | 12/3/2013 |
| Expiration: | 12/3/2023 |



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Armaly Brands, LLC

Table of Contents

| | |
|---|----|
| Authorization | 1 |
| A. Standard Terms and Conditions | 3 |
| 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... | 4 |
| 2. Who is responsible for complying with this permit? | 4 |
| 3. What records must I keep under this permit? | 4 |
| 4. What are my permit fees and when do I pay them?..... | 4 |
| 5. When does my PTIO expire, and when do I need to submit my renewal application? | 4 |
| 6. What happens to this permit if my project is delayed or I do not install or modify my source? | 5 |
| 7. What reports must I submit under this permit? | 5 |
| 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? | 5 |
| 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... | 5 |
| 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? | 6 |
| 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? | 6 |
| 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? | 6 |
| 13. Can I transfer this permit to a new owner or operator?..... | 6 |
| 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? | 7 |
| 15. What happens if a portion of this permit is determined to be invalid? | 7 |
| B. Facility-Wide Terms and Conditions..... | 8 |
| C. Emissions Unit Terms and Conditions | 10 |
| 1. B006, Boiler #3 | 11 |
| 2. P014, Soap Pad Packaging | 15 |
| 3. P015, P015 | 19 |



Final Permit-to-Install and Operate
Armaly Brands, LLC
Permit Number: P0106077
Facility ID: 0149010008
Effective Date: 12/3/2013

Authorization

Facility ID: 0149010008
Application Number(s): A0014186, A0039181
Permit Number: P0106077
Permit Description: PTIO Renewal permit for one boiler and two soap pad packaging lines.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/3/2013
Effective Date: 12/3/2013
Expiration Date: 12/3/2023
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Armaly Brands, LLC
110 W FIRST ST
London, OH 43140

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

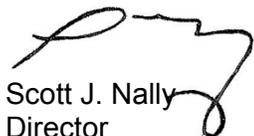
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

A handwritten signature in black ink, appearing to read "Scott J. Nally".
Scott J. Nally
Director



Final Permit-to-Install and Operate
Armaly Brands, LLC
Permit Number: P0106077
Facility ID: 0149010008
Effective Date: 12/3/2013

Authorization (continued)

Permit Number: P0106077

Permit Description: PTIO Renewal permit for one boiler and two soap pad packaging lines.

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

| | |
|-----------------------------------|--------------------|
| Emissions Unit ID: | B006 |
| Company Equipment ID: | Boiler #3 |
| Superseded Permit Number: | 01-2796 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P014 |
| Company Equipment ID: | Soap Pad Packaging |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P015 |
| Company Equipment ID: | P015 |
| Superseded Permit Number: | 01-7454 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate

Armaly Brands, LLC

Permit Number: P0106077

Facility ID: 0149010008

Effective Date: 12/3/2013

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
Armaly Brands, LLC
Permit Number: P0106077
Facility ID: 0149010008
Effective Date: 12/3/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Armaly Brands, LLC

Permit Number: P0106077

Facility ID: 0149010008

Effective Date: 12/3/2013

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.
2. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart JJJJJJ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources*. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



Final Permit-to-Install and Operate
Armaly Brands, LLC
Permit Number: P0106077
Facility ID: 0149010008
Effective Date: 12/3/2013

C. Emissions Unit Terms and Conditions



1. B006, Boiler #3

Operations, Property and/or Equipment Description:

12.5 MMBtu natural gas-fired boiler

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) | Nitrogen oxide (NO _x) emissions shall not exceed 0.2 pound per million British thermal units (lb/MMBtu). See b)(2)a. |
| b. | OAC rule 3745-18-06(E) | Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the sulfur dioxide (SO ₂) emissions limitations established under OAC rule 3745-18-06(D), (F), and (G) during any calendar day in which natural gas is the only fuel burned. See b)(2)a. |
| c. | OAC rule 3745-17-10(B)(1) | Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu. See b)(2)a. |
| d. | OAC rule 3745-17-11(A)(2) | This emissions unit is exempt from the |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| | | PE limitation established in OAC rule 3745-17-11(A)(2) pursuant to OAC rule 3745-17-11(A)(1)(a). |
| e. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| f. | 40 CFR Part 60, subpart Dc | See b)(2)a. and b)(2)b. |

(2) Additional Terms and Conditions

- a. The permittee shall burn only natural gas in this emissions unit.
- b. Emissions unit B006 is subject to the provisions of 40 CFR Part 60, subpart Dc and the application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

Notwithstanding the notification requirements identified in 40 CFR Part 60.48c and the monitoring and recordkeeping requirements established in d)(1), this emissions unit has been determined to be subject to the provisions of 40 CFR Part 60, subpart Dc with no applicable emissions limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. Each type of fuel burned in this emissions unit; and
 - b. The quantity of each fuel burned in this emissions unit.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (2) The permittee shall notify the Director (the appropriate local air agency or District Office) in writing of any fuel burned in this emissions unit other than natural gas. The notification shall include a copy of such record and shall be sent within 45 days after the deviation occurs.
- (3) The following information shall be included in the annual PER:
 - a. An identification of any period of time during which the emissions unit burned a fuel other than natural gas;
 - b. all instances during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (4) The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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. Emissions limitation:

NO_x emissions shall not exceed 0.2 lb/MMBtu.

Applicable Compliance Method:

Compliance with the lb NO_x/MMBtu emissions limitation shall be based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98). Compliance with the lb NO_x/MMBtu emission limitation may be determined by converting the 100 lbs NO_x/10⁶scf emission factor into lb NO_x/MMBtu by dividing by 1,020 MMBtu/10⁶scf.

If required, compliance with the NO_x emissions limitation shall be determined through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

b. Emissions limitation:

PE shall not exceed 0.020 lb/MMBtu.

Applicable Compliance Method:

Compliance with the lb PE/MMBtu emissions limitation shall be based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb PE/MMBtu emission limitation may be determined by converting the 7.6 lbs PE/10⁶scf emission factor into lb PE/MMBtu by dividing by 1,020 MMBtu/10⁶scf.

If required, compliance with the PE limitation shall be determined through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

c. Emissions limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method9.

g) Miscellaneous Requirements

(1) None.



2. P014, Soap Pad Packaging

Operations, Property and/or Equipment Description:

Steel wool soap pad packaging line, building 6

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 3745-17-11(A)(2) | Particulate emissions (PE) shall not exceed 0.59 pound per hour (lb/hr). |
| b. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule. |

(2) **Additional Terms and Conditions**

a. None.

c) **Operational Restrictions**

(1) The emissions from this emissions unit shall be directed to a cyclone at all times when the emissions unit is operating.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall maintain the following records for each month:



- a. The number of pads packed and processed on the line;
 - b. The number of hours the line was in operation; and
 - c. The calculated hourly average particulate emissions determined in accordance with f)(1)a.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (2) The following information shall be included in the annual PER:
 - a. An identification of any period of time during which the emissions unit was operating and emissions were not directed to the cyclone;
 - b. An identification of any calculated average hourly particulate emissions value that exceeded the 0.59 lb/hr PE limitation;



- c. all instances during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - d. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
- 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. Emissions limitation:
PE shall not exceed 0.59 lb/hr.
Applicable Compliance Method:
Compliance with the hourly PE limitation shall be determined using the records required in d)(1) and the following calculation:
$$\text{Average Hourly PE} = [\text{Total Pads Packager per month} * E_f * (1-CE)] / \text{monthly hours of operation}$$
where:
 $E_f = 1.17 \text{ EE-4}$ Determined by multiplying the conversion factor for the amount of soap per pad (.0153 lb soap/pad) by the stack test derived emissions factor in pounds of PE/pound of soap (0.00765 lb PE/lb soap); and
 $CE = 83\%$ The manufacturer's suggested control efficiency.
If required, compliance with the hourly PE limitation shall be determined through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).
Compliance with the annual limitation shall be determined using the records required in d)(2).
 - b. Emissions limitation:
Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.



Final Permit-to-Install and Operate

Armaly Brands, LLC

Permit Number: P0106077

Facility ID: 0149010008

Effective Date: 12/3/2013

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

- (1) None.



3. P015, P015

Operations, Property and/or Equipment Description:

BAPP Steel wool soap pad packaging line, building 7

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) | Particulate emissions (PE) shall not exceed 0.30 pound per hour (lb/hr) and 1.31 tons per year (TPY). |
| b. | OAC rule 3745-17-11(A)(2) | The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be directed to a baghouse at all times when the emissions unit is operating.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records for each month:
 - a. The number of pads packed and processed on the line;
 - b. The number of hours the line was in operation;
 - c. The calculated hourly average particulate emissions determined in accordance with f)(1)a; and
 - d. The calculated monthly particulate emissions determined by multiplying d)(1)b. and d)(1)c. above.
- (2) The permittee shall determine the annual particulate emissions, in tons, from this emissions unit by summing the calculated monthly emissions from d)(1)d. above for each calendar year and converting the total pounds to tons by dividing by 2,000.
- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.

- (2) The following information shall be included in the annual PER:
 - a. An identification of any period of time during which the emissions unit was operating and emissions were not directed to the baghouse;
 - b. An identification of any calculated average hourly particulate emissions value that exceeded the 0.30 lb/hr PE limitation;
 - c. An identification of any calculated annual particulate emissions value that exceeded the 1.31 tpy PE limitation;
 - d. all instances during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - e. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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. Emissions limitations:

PE shall not exceed 0.30 lb/hr and 1.31 TPY.

- Applicable Compliance Method:

Compliance with the hourly PE limitation shall be determined using the records required in d)(1) and the following calculation:

Average Hourly PE = [Total Pads Packager per month * Ef * (1-CE)]/ monthly hours of operation

where:

Ef = 1.17 EE-4

Determined by multiplying the conversion factor for the amount of soap per pad (.0153 lb soap/pad) by the stack test derived emissions factor in pounds of PE/pound of soap (0.00765 lb PE/lb soap); and



CE = 95% The manufacturer's suggested control efficiency.

If required, compliance with the hourly PE limitation shall be determined through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual limitation shall be determined using the records required in d)(2).

b. Emissions limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method9.

g) Miscellaneous Requirements

(1) None.