John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

8/28/2014

Certified Mail

Facility ID: 0374000022
Permit Number: P0116300
County: Seneca

Jason Trausch
Church & Dwight Co.
2501 East County Road 34
Old Fort, OH 44861

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is a final Ohio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it 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 Title V permit 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 regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office as indicated on page one of your permit.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

FINAL

Division of Air Pollution Control
Title V Permit
for
Church & Dwight Co.

Facility ID:	0374000022
Permit Number:	P0116300
Permit Type:	Renewal
Issued:	8/28/2014
Effective:	9/18/2014
Expiration:	9/18/2019

Division of Air Pollution Control
Title V Permit
for
Church & Dwight Co.

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Authorization

Facility ID:	0374000022
Facility Description:	Sodium bicarbonate manufacturing.
Application Number(s):	A0049652, A0049829, A0050740
Permit Number:	P0116300
Permit Description:	Title V renewal permit for processes associated with sodium bicarbonate manufacturing including roadways, MEGALAC system, cat litter manufacturing, cooling tower, limestone receiving and transferring and conveying operations and numerous insignificant emissions units.
Permit Type:	Renewal
Issue Date:	8/28/2014
Effective Date:	9/18/2014
Expiration Date:	9/18/2019
Superseded Permit Number:	P0110217

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Church & Dwight Co.
2501 East County Road 34
Old Fort, OH 44861

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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official

that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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 Ohio EPA DAPC, Northwest District Office, 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 Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P010, P036 and P039 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [Authority for term: 40 CFR Part 64]

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install, or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21 and/or 40 CFR Part 60 and/or 63.

P001 – liquor preparation #1 (PTI #03-6955, issued 06-03-1993);
P002 – crystal formation with scrubber and carbonator vent (PTI #03-6955, issued 06-03-1993);
P003 – crystal separation #1 (PTI #03-673, issued 09-23-1982);
P004 – drying #1 (PTI #03-673, issued 09-23-1982);
P014 – 1# packaging line and 2/#4 packing line (PTI #03-3753, modification issued 04-15-08);
P015 – Armex #1/Armex #2 (PTI #03-4757, issued 11-22-1989);
P018 – D-5 packline (PTI #03-5500, issued 01-24-1991);
P022 – crystal separation #2 (PTI #03-6955, issued 06-03-1993);
P023 – drying #2 (PTI #03-6955, issued 06-03-1993);
P024 – Armex manufacturing (PTI #03-7328, issued 06-16-1993);
P026 – 2/#4 packing line (PTI #03-08223, modification issued 04-15-2008);
P027 – active process, cat/carpet deodorizer elevator and bin (PTI P0112339, issued 02-12-2013);
P032 – Armex profile dry blend (PTI #03-8600, issued 03-22-1995).
G001 – gasoline dispensing station

   [Authority for term: OAC rule 3745-77-07(A)(13)]

4. The following emissions unit located at this facility is subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

P101 – 175 kW emergency diesel generator (PBR08614, effective 03-25-2011)
P102 – 189 hp natural gas emergency generator (PBR08979, effective 07-07-2011)
P104 – 136 hp diesel fired emergency water pump (PBR11758, effective 03-25-2014)

   [Authority for term: OAC rule 3745-77-07(A)(13) and OAC rule 3745-31-03(A)(4)(b)]

5. The existing emergency compression ignition (CI) reciprocating internal combustion engine(s) (RICE), located at an area source for Hazardous Air Pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, **EU# P104**, installed before 6/12/06, shall meet the requirements of 63, Subpart ZZZZ no later than 5/3/13.

The RICE must meet the definition of an emergency stationary RICE in section 63.6675, which includes operating according to the provisions specified in section 63.6640(f), and the permittee shall meet the following requirements contained in 40 CFR Part 63, Subpart ZZZZ:

General Compliance	63.6605(a) and (b)
Monitoring, Installation, Collection, Operation and Maintenance Requirements	63.6603(a), 63.6625(e), (f), (h) and (i)
Continuous Compliance	63.6640 (a), (b), (e), & (f)
Record Keeping	63.6655(d), (e), (f), 63.6660(a), (b) and (c)
Table 8 General Provisions	63.6665

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR 63, Subpart ZZZZ]

6. The new emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), **EU# P101,** installed on or after 6/12/06 and located at an area source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. Emissions unit P101 shall meet the requirements of Part 63, Subpart ZZZZ upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, 40 CFR, Part 60, Subpart IIII.

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart ZZZZ]

7. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 60, Subpart IIII, in accordance with 40 CFR Parts 60.4200 through 60.4219 (including the Table(s) and Appendix(ices) referenced in Subpart IIII).

The following emissions units in this permit are subject to the aforementioned requirements**: EU# P101**.

The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart IIII, including the following sections:

Certification Emission Standards	60.4202(a)
Continuous Compliance	60.4206
Fuel Requirements	60.4207(b)
Monitoring, Installation, Operation and Maintenance Requirements	60.4209(a), 60.4211(a), (f) and (g)
Testing Requirements	60.4212 (a) and (c)
Notification, Reporting and Record Keeping	60.4214(b) and (c)
Special Fuel Requirements	60.4217
General Provisions	60.4218 and Table 8

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 60, Subpart IIII]

8. The new emergency or limited use spark ignition (SI) reciprocating internal combustion engine(s) (RICE), **EU# P102,** installed on or after 6/12/06 and located at an area source for hazardous air

pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. Emissions unit P102 shall meet the requirements of Part 63, Subpart ZZZZ upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, 40 CFR, Part 60, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart ZZZZ and 40 CFR, Part 60, Subpart JJJJ]

9. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 60, Subpart IIII, in accordance with 40 CFR Parts 60.4230 through 60.4248 (including the Table(s) and Appendix(ices) referenced in Subpart JJJJ).

The following emissions units in this permit are subject to the aforementioned requirements**: EU# P102**.

The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart JJJJ, including the following sections:

Emission Standards	60.4233(e), 60.4234 and Table 1
Owner and Operator Monitoring Requirements	60.4237(b)
Owner and Operator Compliance Requirements	60.4243(b), (d), (e), (f) and (g)
Testing Requirements	60.4244(a), (b), (c), (d), (e), (f) and Table 2
Notification, Reporting and Record Keeping	60.4245(a), (d) and (e)
General Provisions	60.4246 and Table 3

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 60, Subpart JJJJ]

10. The existing gasoline dispensing facility (GDF), located at an area source for Hazardous Air Pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Dispensing Facilities, Part 63, Subpart CCCCCC. The existing GDF, **EU# G001**, installed before 11/9/06, shall meet the requirements of 63, Subpart CCCCCC no later than 1/10/11.

The emissions unit must meet the definition of an existing GDF in section 63.11112, and the permittee shall meet the following requirements contained in 40 CFR Part 63, Subpart CCCCCC:

Compliance Requirements	63.11113(b) and (c)
General Provisions	63.11115(a) and (b), 63.11130 and Table 3
Work Practice Standards	63.11116(a), (b), (c), (d)
Record Keeping and Reporting	63.11125(d) and (b)

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart CCCCCC]

C. Emissions Unit Terms and Conditions

1. F001, Plant roadways and parking areas

Operations, Property and/or Equipment Description:

Fugitive Emissions From Traffic

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-673, issued 06-29-1978)	See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. No emissions limitations or control requirements were established under this rule in PTI #03-673.

b. This emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This facility is not located within the areas identified in “Appendix A” of OAC rule 3745-17-08 (it is located in Seneca County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

2. P010, MEGALAC - north reaction conveyor with baghouse

Operations, Property and/or Equipment Description:

North Megalac Bulk Reaction Conveyor and Bagging

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-17457, issued 09-23-2008)	0.03 grains (gr) of particulate emissions (PE)/dry standard cubic foot (dscf); 7.88 tons PE/year Visible emissions shall not exceed 5 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(4), e)(2) and g)(1).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse capable of achieving a maximum outlet concentration of 0.03 grain PE/dry standard cubic foot. BAT requirements also include compliance with the terms and conditions of this permit.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) 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 stack serving this emissions unit. The presence 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. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), PTI #03-17457, and 40 CFR, Part 64]

(2) A CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is a daily visible emission observation of the baghouse stack(s). Whenever visible emissions are observed, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1), and 40 CFR, Part 64]

(4) Investigation and records required by the monitoring and recordkeeping requirements 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.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit written reports for this emissions unit that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

[OAC rule 3745-77-07(C)(1), PTI #03-17457, and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

0.03 grain PE/dscf

<u>Applicable Compliance Method</u>:

This emission limitation was established in accordance with the maximum outlet concentration of the baghouse.

If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. <u>Emission Limitation</u>:

7.88 tons PE/year

Applicable Compliance Method:

The annual limitation was established by multiplying the maximum outlet concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate (7,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation shall also be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

3. P019, North curing bins for MEGALAC product

Operations, Property and/or Equipment Description:

North Megalac Bin Curing Systems

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-5904, issued 10-30-1991)	0.03 grains (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 2.04 lbs PE/hr and 8.94 tons PE/yr Visible PE shall not exceed 0% opacity as a 6-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee employs four product recovery bin vents on emissions unit P019. Each filter is capable of achieving a maximum outlet concentration of 0.03 gr PE/dscf.

b. The Best Available Technology (BAT) requirement for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

c. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. The visible emissions limitation specified by this rule is less stringent than the visible emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 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. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit written reports for this emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

0.03 grains PE/dscf

Applicable Compliance Method:

This emission limitation was established in accordance with the maximum outlet concentration of the baghouse. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

b. Emission Limitation:

2.04 lbs PE/hr and 8.94 tons PE/year

Applicable Compliance Method:

The hourly and annual limitations were established by multiplying the maximum outlet concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate of 8,000 acfm (2,000 acfm/vent x 4 vents), and using the following conversion factors in order to convert to pounds per hour and tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation shall also be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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”).

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

g) Miscellaneous Requirements

(1) None.

4. P036, MEGALAC - south reaction conveyor with baghouse

Operations, Property and/or Equipment Description:

South Megalac Process Reactor

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-17457, issued 09-23-2008)	0.02 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 3.75 tons PE/year Visible emissions shall not exceed 0 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(4), e)(2) and g)(1).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse capable of achieving a maximum outlet concentration of 0.02 grain PE/dry standard cubic foot. BAT requirements also include compliance with the terms and conditions of this permit.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) 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 stack serving this emissions unit. The presence 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. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), PTI #03-17457 and 40 CFR, Part 64]

(2) A CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is any visible emissions from the baghouse stack(s). Whenever visible emissions are observed, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(4) Investigation and records required by the monitoring and recordkeeping requirements 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.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

(2) The permittee shall submit written reports for this emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

[OAC rule 3745-77-07(C)(1) , PTI #03-17457 and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

0.02 grain PE/dscf

<u>Applicable Compliance Method</u>:

This emission limitation was established in accordance with the maximum outlet concentration of the baghouse. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. <u>Emission Limitation</u>:

3.75 tons PE/year

Applicable Compliance Method:

The annual limitation was established by multiplying the maximum outlet concentration (0.02 gr PE/dscf) by the maximum volumetric air flow rate (5,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation shall also be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

5. P039, Cat litter manufacturing line, includes material receiving, handling, mixing, and packaging.

Operations, Property and/or Equipment Description:

Cat Litter Manufacturing Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d. and d)(6).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI P0112339, issued 02-12-2013)	0.01 grain (gr) particulate matter ≤ 10 microns in size (PM_{10})/dry standard cubic foot (dscf) 0.62 pound PM_{10}/hour 2.72 tons PM_{10}/year 12.11 tons volatile organic compounds (VOC) per 12-month, rolling period Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	ORC 3704.03(F) OAC rule 3745-114	See d)(6).
e.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(4), e)(2) and g)(1).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse that is capable of achieving 0.01 grain PM_{10}/dry standard cubic foot.

b. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The visible emissions limitation specified by this rule is less stringent than the visible emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of fragrances and paints employed in this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12}\sum_{i=1}^{n}[V_i P_i] \times \frac{tons}{2000\ lbs} = 12.11\ tons\ VOC/year$$

Where,

M = the increment of the rolling, 12-month period;

V_i = VOC emission factor, in pounds VOC per ton product, of each fragrance employed <u>OR</u> VOC content, in pounds VOC/gallon, of each paint employed, as applicable;

P_i = production rate, in tons, <u>OR</u> gallon usage rate, for the rolling, 12 month period, as applicable; and

n = total number of unique fragrances and paints employed in the emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI P0112339]

d) 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 stack serving this emissions unit. The presence 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. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), PTI P0112339 and 40 CFR Part 64]

(2) A CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is any visible emissions from the baghouse stack(s). Whenever visible emissions are observed, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1), and 40 CFR, Part 64]

(4) Investigation and records required by the monitoring and recordkeeping requirements 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.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) In order to demonstrate compliance with the 12-month, rolling emission limitation, the permittee shall collect and record the following information each month for this emissions unit:

a. the name of each fragrance employed;

b. the vapor pressure, in mm Hg at 20° C, of each fragrance employed;

c. the VOC emission factor, in pound(s) VOC/ton product, of each fragrance employed;

d. the cat litter manufacturing line production rate, in tons/month, during the timeframe each fragrance was employed;

e. the VOC emission rate, in pound(s)/month, from each fragrance [d)(5)c. times d)(5)d.];

f. the name and identification number of each paint employed;

g. the VOC content of each paint employed, in pounds VOC/gallon;

h. the number of gallons of each paint employed, in gallons/month;

i. the VOC emission rate, in pound(s)/month, from each paint employed [d)(5)g. times d)(5)h.];

j. the total VOC emission rate from all fragrances and paints employed, in ton(s)/month [summation of d)(5)e. and d)(5)i. divided by 2,000 pounds/ton]; and

k. the total cumulative VOC emissions during the rolling, 12-month period [summation of VOC emissions, as recorded in d)(5)j., for the present month plus the previous 11 months of operation], in ton(s).

[OAC rule 3745-77-07(C)(1) and PTI P0112339]

(6) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s 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 a permittee to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, 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 PTI.

[PTI P0112339]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1) and PTI P0112339]

(2) The permittee shall submit written reports for this emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

[OAC rule 3745-77-07(C)(1), PTI P0112339 and 40 CFR Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.01 grain PM_{10}/dry standard cubic foot

Applicable Compliance Method:

This emissions limitation was established in accordance with the maximum outlet concentration of the baghouse.

If required, compliance with the emission limitation shall be demonstrated in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

[OAC rule 3745-77-07(C)(1) and PTI P0112339]

b. Emission Limitation:

0.62 pound PM_{10}/hour

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit of this emissions unit and can be calculated using the following equation:

0.01 gr PM_{10} (1)	7200 dscf (2)	1 pound (3)	60 minutes (3)
dscf	minute	7000 grains	hour

Where:

(1) Maximum outlet grain loading of the baghouse, as supplied in the permit application.

(2) Maximum outlet gas flow rate of the baghouse, as supplied in the permit application.

(3) Conversion factors.

If required, compliance with these emission limitations shall be demonstrated in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

[OAC rule 3745-77-07(C)(1) and PTI P0112339]

c. Emission Limitation:

2.72 tons PM_{10}/year

Applicable Compliance Method:

The annual emission limitation was calculated using the following equation:

0.62 pound PM_{10} (1)	8760 hours (2)	1 ton (3)
hour	year	2000 pounds

Where:

(1) Hourly emission limitation.

(2) Maximum, annual operating schedule.

(3) Conversion factor.

Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0112339]

d. Emission Limitation:

12.11 tons VOC per rolling, 12-month period

Applicable Compliance Method:

The annual emission limitation was established as a summation of the maximum annual emission rates from the use of fragrances and paints in this emissions unit, as follows:

11.66 tons VOC from fragrances	+	0.45 ton VOC from paints
year		year

i. Fragrances:

0.088 lb VOC (1)	164250 tons (2)	1 ton (3)	+	0.018 lb VOC (1)	492750 tons (2)	1 ton (3)
ton	year	2000 lbs		ton	year	2000 lbs

Where:

(1) Company-supplied emission factors based on emission testing conducted at the York Davies Church & Dwight Facility on 8/31/2011.

(2) Maximum, annual cat/carpet deodorizer line production rates. The company is assuming that 75% of the fragrances used are ≤ 0.018

pound VOC/ton and 25% of the fragrances used are > 0.018 pound VOC/ton and ≤ 0.088 pound VOC/ton.

(3) Conversion factor.

ii. Paints:

0.01 lb VOC (1)	10.3 gallons (2)	8760 hours (3)	1 ton (4)
gallon	hour	year	2000 lbs

Where:

(1) Maximum VOC content of paints employed, as specified in the permit application.

(2) Maximum, hourly gallon usage rate of paints, as specified in the permit application.

(3) Maximum, annual operating schedule.

(4) Conversion factor.

The permittee shall demonstrate compliance with the 12-month, rolling VOC emission limitation in accordance with the recordkeeping requirements established in d)(5).

[OAC rule 3745-77-07(C)(1) and PTI P0112339]

e. Emission Limitation:

Visible particulate emissions from each stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI P0112339]

g) Miscellaneous Requirements

(1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

6. P040, 2500 gallon/minute, induced draft, sodium bicarbonate cooling tower

Operations, Property and/or Equipment Description:

2500 GPM Noncontact Cooling Tower

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)(a) (PTI #03-17434, issued 09-04-2008)	1.75 pounds particulate matter 10 microns or less in size (PM10)/hour; 7.67 tons PM10/year Visible emissions shall not exceed 5 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

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

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a). This determination is based on all emissions of particulate matter being PM10 and the established PM10 limitation being more restrictive than the particulate emissions limitation established by OAC rule 3745-17-11(B)(5)(a). Particulate emissions (PE) measured using Method 5 of 40 CFR Part 60, Appendix A would be equivalent to the filterable particulates measured using Method 201/201A of 40 CFR, Part 51, Appendix M. A PM10 limitation is more stringent due to the inclusion of condensable particulate matter measured by Method 202 of 40 CFR, Part 51, Appendix M.

c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).

c) Operational Restrictions

(1) The permittee shall maintain the total dissolved solids (TDS) content of the circulating cooling water at 7,000 mg/L or less, as a monthly average.

[OAC rule 3745-77-07(A)(1) and PTI #03-17434]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall determine the TDS content, in mg/L, of the cooling tower water in accordance with the following:

a. Conductivity shall be used to determine the TDS content of the cooling tower water based on an established correlation (or index) between TDS and conductivity of the cooling water.

b. The permittee shall properly install, operate, and maintain equipment to continuously monitor and electronically record the conductivity of the cooling tower water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

c. The permittee shall employ a computerized data management system to determine the conductivity based on a monthly average of the electronically recorded information.

d. If the continuous conductivity monitor malfunctions or is otherwise not operational for greater than a 24-hour period:

i. The permittee shall notify the Ohio EPA district office or local air agency of such malfunction as soon as practicable, but not later than twenty-four hours after the discovery of the event. Notification shall take the form of a telephone call, fax, or other electronic notification.

ii. The duration of the equipment malfunction shall be recorded.

iii. The permittee shall perform and record daily conductivity tests of samples from the cooling tower water until the malfunction is resolved. The results of the samples shall be applied to the monthly conductivity calculation.

iv. The Ohio EPA district office or local air agency shall be notified when the condition causing the malfunction was corrected and the equipment is again in operation. Notification shall take the form of a telephone call, fax, or other electronic notification and shall occur as expeditiously as practicable, but no later than two weeks after the correction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit written reports for this emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit deviation (excursion) reports that identify any exceedances of the TDS content requirement. These reports shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>:

1.75 pounds PM10/hour and 7.67 tons PM10/year

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum water flow rate of 2,500 gallons/minute by the drift loss factor of 0.0002, the total dissolved solids content (in mg/L), and applying the conversion factors of 60 minutes/hour, 3.785412 L/gal, and 453,592.4 mg/pound to convert to pounds/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

b. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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").

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

g) Miscellaneous Requirements

(1) None.

7. P103, Baking Soda Recycling System

Operations, Property and/or Equipment Description:

baking soda recycling system with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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) (PTI P0116812, issued 05-14-2014)	0.03 grain particulate matter ≤ 10 microns (PM_{10})/dry standard cubic foot (dscf) & 1.75 tons PM_{10}/year Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed zero percent (0%) opacity, as a six-minute average. See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTI P0116812, issued 05-14-2014)	0.03 grain PM_{10}/dscf [See b)(2)b.]
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006 (PTI P0116812, issued 05-14-2014)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).
e.	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations. The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restriction specified in c)(1) which requires control equipment.

i. 0.03 grain PM_{10}/dscf;

ii. 1.75 tons PM_{10}/year; and

iii. Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed zero percent (0%) opacity as a six-minute average.

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective November 30, 2001, have been determined to be compliance with the 0.03 grain PM_{10}/dscf restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.].

The permittee has satisfied the Best Available Technology (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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 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, the requirements of 3745-31-05(A)(3), as effective December 1, 2006, will no longer apply.

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM_{10} emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration the practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

c) Operational Restrictions

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

a. The baking soda recycling system shall be vented to a dust collection system capable of achieving a maximum outlet concentration of 0.03 gr PM_{10}/dscf.

[OAC rule 3745-77-07(A)(1) and PTI P0116812]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible emissions from the baghouse vent/stack associated with 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 log:

a. the color of the emissions;

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

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI P0116812]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1) and PTI P0116812]

(2) The permittee shall submit written reports for this emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall include in the semiannual report, the following information concerning the visible emission checks during the operation of this emissions unit:

i. all visible emission checks during which any visible particulate emissions were observed from the baghouse vent/stack serving this emissions unit; and

ii. any corrective actions taken to minimize or eliminate the visible particulate emissions identified in e)(2)a.i.

[OAC rule 3745-77-07(C)(1) and PTI P0116812]

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 gr PM_{10}/dscf

Applicable Compliance Method

This emission limitation represents the potential to emit (PTE) of this emissions unit. Therefore, no record keeping or compliance method calculations are required to demonstrate compliance.

If required, compliance with the emission limitation shall be demonstrated in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

[OAC rule 3745-77-07(C)(1) and PTI P0116812]

b. Emission Limitation

1.75 tons PM_{10}/year

Applicable Compliance Method

The annual emission limitation was established based on the maximum annual hours of operation and can be calculated, as follows:

0.03 gr PM_{10} (1)	1550 dscf (2)	1 lb (3)	60 mins (3)	1 ton (3)	8760 hrs (4)
hr	min	7000 gr	hr	2000 lbs	yr

Where:

(1) Maximum outlet concentration, as provided in the permit application.

(2) Maximum outlet gas flow rate of the baghouse, as provided in the permit application.

(3) Conversion rates.

(4) Maximum annual operating schedule, as provided in the permit application.

Therefore, provided compliance is shown with the outlet concentration restriction, compliance with the annual emissions limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0116812]

c. Emission Limitation

Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed zero percent (0%) opacity, as a six-minute average.

Applicable Compliance Method

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

[OAC rule 3745-77-07(C)(1) and PTI P0116812]

g) Miscellaneous Requirements

(1) None.

8. P902, limestone receiving, storage, and transfer

Operations, Property and/or Equipment Description:

Limestone receiving, storage, and transfer system for the cat litter manufacturing line (P039)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)(a) [PTI P0106426, issued 01/18/2011]	2.74 tons fugitive particulate emissions (PE)/year 1.21 tons fugitive particulate matter 10 microns or less in size (PM_{10})/year Visible fugitive PE from the material transfer points shall not exceed ten percent (10%) opacity, as a six-minute average. See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(D) [PTI P0106426, issued 01/18/2011]	1.23 pounds PM_{10}/hour and 5.39 tons PM_{10}/year from the limestone receiving baghouse Visible fugitive PE from the egress points associated with the building enclosing the limestone receiving operation shall not exceed ten percent (10%) opacity, as a six-minute average. Visible PE from the baghouse vent shall not exceed ten percent (10%) opacity, as a six-minute average. See b)(2)d. and b)(2)e.
c.	OAC rule 3745-17-11(B)	See b)(2)f.
d.	OAC rule 3745-17-07(A)	See b)(2)g.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B)	See b)(2)h.
f.	OAC rule 3745-17-07(B)	See b)(2)i.

(2) Additional Terms and Conditions

a. The operations covered by this permit and subject to the above-mentioned requirements are listed below:

i. Limestone receiving;

ii. (2) Limestone storage silos; and

iii. (6) Limestone transfer points.

b. The "Best Available Technology" (BAT) control requirements for this emissions unit have been determined to be the following:

i. Limestone receiving shall be equipped with a building enclosure vented to a baghouse capable of achieving 0.02 grains PM_{10}/dscf.

ii. The limestone conveyors shall be equipped with 3-sided enclosures.

BAT requirements also include compliance with the terms and conditions of this permit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-31-05(D).

d. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD). The federally enforceable emission limitations are based on the operational restriction contained in c)(1):

i. 1.23 pound PM_{10}/hour and 5.39 tons PM_{10}/year;

ii. Visible fugitive PE from the egress points associated with the building enclosing the limestone receiving operation shall not exceed ten percent (10%) opacity, as a six-minute average.

iii. Visible PE from the baghouse vent shall not exceed ten percent (10%) opacity, as a six-minute average.

All emissions of particulate matter from the dust collector stack are PM_{10}.

e. The limestone receiving baghouse vents inside the building enclosure; therefore the visible fugitive emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a) and the corresponding monitoring, recordkeeping, and reporting

requirements effectively restrict and monitor the visible emissions from the limestone receiving operation. No additional monitoring, recordkeeping, or reporting requirements were established to verify compliance with the visible emission limitation established for the baghouse.

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

g. The visible emissions limitation specified by this rule is less stringent than the visible emissions limitation established pursuant to OAC rule 3745-31-05(D).

h. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), the emissions unit is exempt from the requirements of OAC rule 3745-17-08.

i. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

c) Operational Restrictions

(1) The following operational restriction is being established for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)d.]:

a. The enclosed limestone receiving operation shall be vented to a dust collection system capable of achieving a maximum outlet concentration of 0.02 grain particulate matter less than or equal to 10 microns (PM_{10})/dscf

[OAC rule 3745-77-07(A)(1) and PTI P0106426]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log and shall be kept separately for:

a. the egress points (i.e., building windows, doors, roof monitors, etc.) serving the building enclosure for the limestone receiving operation; and

b. the limestone transferring and conveying operation.

If visible emissions are observed, the permittee shall also note the following in the operations log:

c. the location and color of the emissions;

d. whether the emissions are representative of normal operations;

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

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

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)f. above or continue the daily check until the incident has ended.

The observer may indicate that the visible emission 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.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

(2) The permittee shall submit written reports for this emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible fugitive particulate emissions were observed from the egress points serving the building enclosure for the limestone receiving operation and from the limestone transferring and conveying emissions points; and

ii. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

2.74 tons fugitive PE/year; 1.21 tons fugitive PM_{10}/year

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by multiplying the emission factor provided in Section 11.9 of Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (7/1998) for bottom dump truck unloading (0.0066 pound PE/ton) by the maximum annual limestone throughput of 190,000 tons and then dividing by 2,000 pounds/ton. A control efficiency of 70% was applied for the use of a building enclosure vented to a baghouse. PM_{10} emissions were estimated using a PE to PM_{10} relative ratio of 2.1:1, derived from AP-42 Section 13.2.4 (1/1995). Should further updates in AP-42 occur, the most current emission factors shall be used.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

b. Emission Limitation:

0.02 gr PM_{10}/dscf

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the dust collector.

If required, the permittee shall demonstrate compliance by testing 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. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

c. Emission Limitation:

1.23 pounds PM_{10}/hour

Applicable Compliance Method:

The hourly limitation was established by multiplying the maximum outlet grain loading concentration of 0.02 gr PM_{10}/dscf and the maximum volumetric air flow rate (7,200 cfm) from this emissions unit to the baghouse, and using the following conversion factors in order to covert to pounds per hour: 1 pound/7000 grains and 60 minutes/hour. Therefore, provided compliance is demonstrated with the 0.02 gr PM_{10}/dscf limitation, compliance with the hourly limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance by testing 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. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

d. Emission Limitation:

5.39 tons PM_{10}/year

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is maintained with the 0.02 gr PM_{10}/dscf limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

e. Emission Limitation

Visible PE associated with the limestone receiving baghouse shall not exceed 10 percent (10%) opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined though visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

f. Emission Limitation:

Visible fugitive PE from the egress points associated with the building enclosing the limestone receiving operation and from the material transfer points shall not exceed 10 percent (10%) opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined though visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0106426]

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group - MEGALAC North Group: P011, P012, P020

EU ID	Operations, Property and/or Equipment Description
P011	Megalac Cooler conveying, screening, milling, super sacking (now includes P012, P020, and P025)
P012	Megalac Conveying, screening, milling, super sacking
P020	Megalac Bulk Truck and Rail Loading

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-17457, issued 09-23-2008)	<u>combined emission limits for P011, P012, and P020 (baghouse M-116)</u>: 0.03 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 7.88 tons PE/year Visible emissions shall not exceed 5 percent opacity, as a six-minute average. See b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee employs a common product recovery baghouse (M-116) on emissions units P011, P012, and P020 that is capable of achieving a maximum outlet concentration of 0.03 gr PE/dscf.

b. Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 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. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for each emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit written reports for each emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. describe any corrective actions taken to eliminate the visible particulate emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

combined emission limit for P011, P012, and P020 - 0.03 grain PE/dscf

Applicable Compliance Method:

This emission limitation was established in accordance with the maximum outlet concentration of the baghouse.

If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. Emission Limitation:

Combined emission limit for P011, P012, and P020 – 7.88 tons PE/yr

Applicable Compliance Method:

The annual limitation was established by multiplying the maximum outlet concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate (7,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation shall also be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group - Megalac South Group: P033, P034

EU ID	Operations, Property and/or Equipment Description
P033	Megalac Curing Bins
P034	South Megalac Reactor Cooling (tied into P035)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-17457, issued 09-23-2008)	0.02 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf) for P033 and P034, individually 5.58 tons PE/year for P033 only 7.51 tons PE/year for P034 only Visible emissions shall not exceed 0 percent opacity, as a six-minute average, for P033 and P034, individually. See b)(2)a. through b)(2)c.
b.	OAC rule 3745-17-11(B)	See b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee employs three product recovery bin vents (M-245, M-246, and M-247) on emissions unit P033. Each filter is capable of achieving a maximum outlet concentration of 0.02 gr PE/dscf.

b. The permittee employs a product recovery baghouse (M-216) on emissions unit P034 that is capable of achieving a maximum outlet concentration of 0.02 gr PE/dscf.

c. Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

e. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 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. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for each emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit written reports for each emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.02 grain PE/dscf for P033 and P034, individually

Applicable Compliance Method:

This emission limitation was established in accordance with the maximum outlet concentration of the bin vents.

If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. Emission Limitation:

5.58 tons PE/year for P033 and 7.51 tons PE/year for P034

Applicable Compliance Method:

The annual limitation for P033 was established by summing the annual emissions from each of the three bin vents, calculated by multiplying the maximum outlet concentration (0.02 gr PE/dscf) by the maximum volumetric air flow rate (2,475 acfm/bin vent), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds.

The annual limitation for P034 was established by multiplying the maximum outlet concentration (0.02 gr PE/dscf) by the maximum volumetric air flow rate (10,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.02 gr PE/dscf limitation, compliance with the annual limitation will be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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").

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group - Sodium Bicarbonate Group: P005, P031

EU ID	Operations, Property and/or Equipment Description
P005	Classification, Conveying, TFF Bulk Loading (was P013) and Bagging with Baghouse (was P901) - no fugitives
P031	Non USP Bagger

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-17433, modification issued 04-15-2008)	7.54 lbs particulate emissions (PE)/hr and 33.0 tons PE/yr for P005 1.42 lbs PE/hr and 6.22 tons PE/yr for P031 Visible emissions shall not exceed 0 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements have been determined to be the use of two product recovery baghouses for P005, and one product recovery baghouse for P031, each capable of achieving a maximum outlet grain loading of 0.03 grains PE/dscf.

b. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The visible emissions limitation specified by this rule is less stringent than the visible emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 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. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for each emissions unit that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit written reports for each emissions unit that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

7.54 lbs PE/hr and 33.0 tons PE/yr for P005

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly emissions limitation by summing the hourly emissions from the two baghouses controlling this emissions unit. The hourly emissions were calculated by multiplying the maximum outlet PE concentrations of each baghouse (0.03 gr PE/dscf) by the corresponding maximum volumetric air flow rates (DC-101 = 9,000 ACFM; DC-201 = 20,000 ACFM), and using the following conversion factors in order to convert to lb/hr: 60 minutes/hr and 1 lb/7,000 grains.

If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation will be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

b. Emission Limitations:

1.42 lbs PE/hr and 6.22 tons PE/yr for P031

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly emissions limitation by multiplying the maximum outlet PE concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate (5,000 ACFM), and using the following conversion factors in order to convert to pounds per hour: 1 pound/7,000 grains, 60 minutes/hour.

If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation will be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation 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").

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

g) Miscellaneous Requirements

(1) None.