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

9/29/2014

Certified Mail

Facility ID: 1431394137
Permit Number: P0109648
County: Hamilton

Mr. Jeff Luehrmann
St. Bernard Soap Company
5177 Spring Grove Ave.
Cincinnati, OH 45217

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

Dear Permit Holder:

Enclosed is a finalOhio 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 Southwest Ohio Air Quality Agency as indicated on page one of your permit.

Sincerely,

Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Southwest Ohio Air Quality Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
St. Bernard Soap Company

Facility ID:	1431394137
Permit Number:	P0109648
Permit Type:	Renewal
Issued:	9/29/2014
Effective:	10/20/2014
Expiration:	10/20/2019

Division of Air Pollution Control
Title V Permit
for
St. Bernard Soap Company

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Authorization

Facility ID:	1431394137
Facility Description:	Soaps and other detergents manufacturer
Application Number(s):	A0043181
Permit Number:	P0109648
Permit Description:	Renewal of Title V Operating Permit for bar soap manufacturing facility, which includes base soap making, soap mixing, soap drying, bar soap making, and bar soap packing operations.
Permit Type:	Renewal
Issue Date:	9/29/2014
Effective Date:	10/20/2014
Expiration Date:	10/20/2019
Superseded Permit Number:	P0099952

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

St. Bernard Soap Company
5177 Spring Grove Avenue
Cincinnati, OH 45217

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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 Southwest Ohio Air Quality Agency. 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 recordingsfor 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 submittedscheduled maintenancerequests, 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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 permitexcept 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency) 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 intermittentconsistent 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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, noemissions unit identified in this permit that has beencertified 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 theSouthwest Ohio Air Quality Agency.

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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 ofan 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 Southwest Ohio Air Quality Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the 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. 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 requirements 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 or 63:

   P047 – Base Soap Making Plant [Permit to Install #P0115819]

   P048 – Base Soap Making Plant [Permit to Install #P0115819]

   P056 – Central Vacuum System - Bar Soap Making & Packing, IS-20 [Permit to Install # 14-2109]

   P163 – Making Shop Parts Washer 1

   P164 – Packing Shop Parts Washer

   P165 – Freeze Bar Parts Washer

   P166 – C-BSM Fab Area Parts Washer

   T009 – 7,000 Gallon Hydrochloric Acid Storage Tank, IS-14A [Permit to Install #14-04279]

3. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units P030, P122, P125, P129, P130, P131, P132, P133, P135, P136, P137, P138, P139, P145, P150, P155, P156, P157, P158, P160, and P161. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

   (Authority for term: 40 CFR Part 64)

C. Emissions Unit Terms and Conditions

1. P001, CSM Making System, IS-1A

Operations, Property and/or Equipment Description:

Bar soap production (vacuum dryer, start-up receiver, re-blend receiver)

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(A)(3), as effective 11/30/01 (PTI P0115819, 12/06/13)	Particulate emissions (PE) and particulate Matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.08 ton per year. Volatile organic compound (VOC) emissions shall not exceed 0.63 pound per hour and 2.77 tons per year. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(C) Voluntary restriction to avoid Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	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(A)(3).
f.	OAC rule 3745-21-07(M)(2)	See b)(2)d.

(2) Additional Terms and Conditions

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

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC's is less than 10 tons/year, taking into account the following federally enforceable rule limit under OAC rule 3745-21-07(M)(2):

i. The emissions unit shall be equipped with a capture and control system that reduces the organic compound emissions by an overall control efficiency of at least 85%, by weight.

c. Permit to Install P0115819 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.08 ton per year.

ii. The emissions from this emissions unit shall be vented to a baghouse with a control efficiency of 99.9% at all times the emissions unit is in operation.

d. The emissions unit shall be equipped with a capture and control system that reduces the organic compound emissions by an overall control efficiency of at least 85%, by weight.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The acceptable range for the pressure drop across the baghouse is 1 to 8 inches of water.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the average scrubber liquid flow rate, for any 3-hour block of time, shall not be less than 25 gallons per minute or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-21-07(M)(2))

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubber liquid flow rate (in gallons per minute during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the flow rate on an hourly basis. The 3-hour rolling average for the hourly flow rate recorded above shall also be recorded. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-21-07(M)(2))

(4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the average temperature of the exhaust gases from the condenser, for any 3-hour block of time when the emissions unit controlled by the condenser is in operation, shall not exceed 100 degrees Fahrenheit or as specified as the normal operating temperature by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed,

calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee.

Whenever the monitored temperature of the exhaust gases from the condenser deviates from the range/limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was deviation;

j. the temperature readings of the exhaust gas from condenser immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas temperature range/limit will not constitute a relaxation of the

monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-21-07(M)(2))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0115819, issued 12/06/2013: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

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

a. each period of time (start time and date, and end time and date) when the the liquid flow rate was outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-21-07(M)(2))

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

a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the condenser was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the condenser into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-21-07(M)(2))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to

Install P0115819, issued 12/06/2013: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Volatile organic compound (VOC) emissions shall not exceed 0.63 pound per hour and 2.77 tons per year.

The controlled potential to emit for VOC emissions from this air contaminant source is less than ten tons per year.

Applicable Compliance Method:

The hourly emission rate of 0.63 pound per hour is based on stack test results. The annual VOC emission limitation was developed by multiplying the hourly VOC emission limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

PE/PM10 shall not exceed .02 pound per hour and .08 ton per year.

Applicable Compliance Method:

Emissions from the baghouse are determined by multiplying the maximum uncontrolled particulate emissions vented to the baghouse of 17.1 pounds per hour by the baghouse control efficiency of 99.9%.

17.1 pounds of PE/PM10 x (1-0.999) = 0.02 pound of PE per hour

The PE/PM10 limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-06091, submitted on January 28, 2009. If required, compliance with the PE/PM10 limit shall be demonstrated by emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual PE/PM10 limitation was developed by multiplying the hourly PE/PM10 limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the

hourly emission limitation, compliance will also be shown with the annual limitation.

If required, compliance with the pound per hour emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the stack visible emission limitation shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit).

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for OC emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60 Appendix A, Methods 1-4, and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or

approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-21-07(M)(2))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0115819, issued 12/06/2013: f)(1) and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

2. P030, Bar Soap Interim Storage/Back Bins 4 thru 9

Operations, Property and/or Equipment Description:

Dry Soap Storage

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(A)(3), as effective 11/30/01 ORC 3704.03(T) (Permit to Install P0116411, issued on 3/28/2014)	Install a baghouse with a design control efficiency of at least 99.9% for particulate emissions and particulate matter emissions 10 microns and less in diameter, (PE, PM10). See b)(2)a.
b.	OAC rule 3745-31-05(C), as effective 12/01/06 Voluntary Restriction to avoid Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
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(C) as effective 12/01/06 and OAC rule 3745-31-05(A)(3), as effective 11/30/01.
e.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)c., d)(1) – d)(5), e)(1), and e)(2).

(2) Additional Terms and Conditions

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

b. Permit to Install P0116411 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.97 tons per year.

ii. The emissions from this emissions unit shall be vented to a baghouse with a control efficiency of 99.9% at all times the emissions unit is in operation.

c. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(3). The baghouse indicator range for the pressure drop across the baghouse is specified in d)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(C), and 40 CFR Part 64.7)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 8 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(C), and 40 CFR Part 64.3)

(3) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with d)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(C), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(5) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2)-d)(4), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0116411, issued 03/28/14: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in d)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in d)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(C), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(5) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0116411, issued 03/28/2014: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

b. Emission Limitations:

Particulate Emissions (PE) and Particulate Matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.97 tons per year.

Applicable Compliance Method:

The PE limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application for P0107226, submitted on November 23, 2010. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

It shall be assumed that all PE is PM10.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

(2) If required, the permittee shall conduct an initial compliance test in order to determine the overall control efficiency of the baghouse. Stack testing shall be conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0116411, issued 03/28/2014: f)(1) – f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

3. P055, Ivory Bar Soap Making and Packing, IS-19

Operations, Property and/or Equipment Description:

Ivory Bar Soap Production

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(A)(3) (Permit to Install #14-03596, issued 12/07/1994)	Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.015 pound per hour. Organic compound (OC) emissions shall not exceed 1.35 pounds per hour* and 32.4 pounds per day* * The hourly and daily emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no hourly or daily recordkeeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouses IS-19b and IS-19c at all times the emissions unit is in operation. The baghouse filter shall control at least 99.8% of the particulate matter emissions produced in this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across baghouses IS-19b and IS-19c is between 1 to 5 inches of water.

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

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with d)(1), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in d)(1), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The range or limit on the pressure drop across each baghouse specified in d)(1) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03596, issued on 12/07/94: d)(1) - d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the pressure drop across each baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouses;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03596, issued on 12/07/94: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.015 pound per hour.

Applicable Compliance Method:

Compliance with the hourly PE limit stated in b)(1) shall be demonstrated by multiplying the uncontrolled emission rate of 7.5 pounds per hour by the baghouse control efficiency, 99.8%.

If required, compliance with the pound per hour emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 1.35 pounds per hour and 32.4 pounds per day.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be determined by multiplying the maximum production rate, 39,720 pounds per hour, by the emission factor, 0.034 pound per 1000 pounds of soap produced. The 0.034 pound/1000 pounds of soap produced is based on information submitted with PTI application # 14-03596.

Compliance with the daily OC emission limitation shall be determined by multiplying the hourly OC emission limitation by 24 hours per day.

If required, compliance with the pounds per hour emission limitation shall be demonstrated by stack testing conducted in accordance with Method 25 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable compliance method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03596, issued on 12/07/94: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

4. P104, Milled Bar Soap Drying System No. 1, IS-21

Operations, Property and/or Equipment Description:

Soap Dryer 1

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	The following emission limitations shall not be exceed: Particulate Emissions (PE) shall not exceed 0.0087 pound per hour* and 0.035 ton per year*. Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.0071 pound per hour* and 0.029 ton per year*. Organic Compound (OC) emissions shall not exceed 0.63 pound per hour from the thermal oxidizer or 1.95 pounds per hour from the scrubber and 4.23 tons per year. Sulfur Dioxide (SO2) emissions shall not exceed 0.001 pound per hour* and 0.0048 ton per year*. Carbon Monoxide (CO) emissions shall not exceed 0.16 pound per hour* and 0.68 ton per year*. Nitrogen Oxide (NOx) emissions shall not exceed 0.25 pound per hour* and 1.11 tons per year*.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		* The hourly and ton per year emission limitations established are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. See c)(1) and c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-21-07(M)(2)	See b)(2)b. The requirements of this rule are more stringent than the OC control requirements established pursuant to OAC rule 3745-31-05(A)(3). The permittee shall comply with all applicable requirements (including any less stringent requirements) unless otherwise approved in b)(2)b.

(2) Additional Terms and Conditions

a. All of the OC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the OC emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. The permittee is subject to the general control requirement established in accordance with OAC rule 3745-21-07(M)(2), as effective February 18, 2008. Each article, machine, equipment or other contrivance identified in paragraph (M)(1) of this rule shall be equipped with a control system (i.e. capture and control equipment) that reduces the organic compound emissions from the article, machine, equipment or other contrivance by an overall control efficiency

of at least eighty-five percent, by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide. This general control requirement is effective until USEPA approves Ohio EPA's request to remove emissions unit P104 from the affected emissions unit list in OAC rule 3745-21-07(M)(1). This 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 3745-21-07(M)(1), the requirement to comply with the general control requirements still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the requested version of OAC rule 3745-21-07(M)(1), then the emission control measure no longer applies.

c) Operational Restrictions

(1) The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(2) The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Southwest Ohio Air Quality Agency of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The average temperature of the retention chamber of the thermal oxidizer for any 3-hour block of time when the emissions unit is in operation shall not be less than 1650 degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was below 1650 degrees Fahrenheit;

b. a log (date and total time) of the downtime of the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation; and

c. the hours of operation of the scrubber.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Whenever the monitored average combustion temperature within the thermal oxidizer is less than 1650 degrees Fahrenheit during any 3-hour block of time, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The temperature limit of 1650 degrees Fahrenheit as specified in c)(3) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3-hour blocks of time during which the average temperature of the thermal oxidizer is less than 1650 degrees Fahrenheit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions 10 microns and less from emissions units P104 – P107 and P126 – P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Particulate Emissions (PE) shall not exceed 0.0087 pound per hour and 0.035 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.0071 pound per hour and 0.029 ton per year.

Applicable Compliance Method:

Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates) and multiplying by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 201 and 201A of 40 CFR, Part 51, Appendix M.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 0.63 pound per hour from the thermal oxidizer or 1.95 pounds per hour from the scrubber and 4.23 tons per year.

Applicable Compliance Method:

Compliance with hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 6535 hrs/yr.

Compliance with hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor of 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 2225 hrs/yr (identified in c)(2)).

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Sulfur Dioxide (SO2) emissions shall not exceed 0.001 pound per hour and 0.0048 ton per year.

Applicable Compliance Method:

Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 SO2 emission factor for natural gas (0.6 lbs of SO2/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitation:

Carbon Monoxide (CO) emissions shall not exceed 0.16 pound per hour and 0.68 ton per year.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 CO emission factor for natural gas (84 lbs of CO/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Nitrogen Oxide (NOx) emissions shall not exceed 0.25 pound per hour and 1.11 tons per year.

Applicable Compliance Method:

Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 NOx emission factor for natural gas (100 lbs of NOx/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit).

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for OC emissions in c)(1) and b)(2)a.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60 Appendix A, Methods 1-4, and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-07(M)(2) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

5. P105, Milled Bar Soap Drying System No. 2, IS-21

Operations, Property and/or Equipment Description:

Soap Dryer 2

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	The following emission limitations shall not be exceed: Particulate Emissions (PE) shall not exceed 0.0087 pound per hour* and 0.035 ton per year*. Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.0071 pound per hour* and 0.029 ton per year*. Organic Compound (OC) emissions shall not exceed 0.63 pound per hour from the thermal oxidizer or 1.95 pounds per hour from the scrubber and 4.23 tons per year. Sulfur Dioxide (SO2) emissions shall not exceed 0.001 pound per hour* and 0.0048 ton per year*. Carbon Monoxide (CO) emissions shall not exceed 0.16 pound per hour* and 0.68 ton per year*. Nitrogen Oxide (NOx) emissions shall not exceed 0.25 pound per hour* and 1.11 tons per year*.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		* The hourly and ton per year emission limitations established are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. See c)(1) and c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-21-07(M)(2)	See b)(2)b. The requirements of this rule are more stringent than the OC control requirements established pursuant to OAC rule 3745-31-05(A)(3). The permittee shall comply with all applicable requirements (including any less stringent requirements) unless otherwise approved in b)(2)b.

(2) Additional Terms and Conditions

a. All of the OC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the OC emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. The permittee is subject to the general control requirement established in accordance with OAC rule 3745-21-07(M)(2), as effective February 18, 2008. Each article, machine, equipment or other contrivance identified in paragraph (M)(1) of this rule shall be equipped with a control system (i.e. capture and control equipment) that reduces the organic compound emissions from the article, machine, equipment or other contrivance by an overall control efficiency

of at least eighty-five percent, by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide. This general control requirement is effective until USEPA approves Ohio EPA's request to remove emissions unit P105 from the affected emissions unit list in OAC rule 3745-21-07(M)(1). This 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 3745-21-07(M)(1), the requirement to comply with the general control requirements still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the requested version of OAC rule 3745-21-07(M)(1), then the emission control measure no longer applies.

c) Operational Restrictions

(1) The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(2) The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Southwest Ohio Air Quality Agency of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The average temperature of the retention chamber of the thermal oxidizer for any 3-hour block of time when the emissions unit is in operation shall not be less than 1650 degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was below 1650 degrees Fahrenheit;

b. a log (date and total time) of the downtime of the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation; and

c. the hours of operation of the scrubber.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Whenever the monitored average combustion temperature within the thermal oxidizer is less than 1650 degrees Fahrenheit during any 3-hour block of time, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The temperature limit of 1650 degrees Fahrenheit as specified in c)(3) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3-hour blocks of time during which the average temperature of the thermal oxidizer is less than 1650 degrees Fahrenheit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions 10 microns and less from emissions units P104 – P107 and P126 – P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Particulate Emissions (PE) shall not exceed 0.0087 pound per hour and 0.035 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.0071 pound per hour and 0.029 ton per year.

Applicable Compliance Method:

Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates) and multiplying by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 201 and 201A of 40 CFR, Part 51, Appendix M.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 0.63 pound per hour from the thermal oxidizer or 1.95 pounds per hour from the scrubber and 4.23 tons per year.

Applicable Compliance Method:

Compliance with hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 6535 hrs/yr.

Compliance with hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor of 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 2225 hrs/yr (identified in c)(2)).

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Sulfur Dioxide (SO2) emissions shall not exceed 0.001 pound per hour and 0.0048 ton per year.

Applicable Compliance Method:

Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 SO2 emission factor for natural gas (0.6 lbs of SO2/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitation:

Carbon Monoxide (CO) emissions shall not exceed 0.16 pound per hour and 0.68 ton per year.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 CO emission factor for natural gas (84 lbs of CO/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Nitrogen Oxide (NOx) emissions shall not exceed 0.25 pound per hour and 1.11 tons per year.

Applicable Compliance Method:

Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 NOx emission factor for natural gas (100 lbs of NOx/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit).

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for OC emissions in c)(1) and b)(2)a.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60 Appendix A, Methods 1-4, and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-07(M)(2), and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

6. P106, Milled Bar Soap Drying System No. 3, IS-21

Operations, Property and/or Equipment Description:

Soap Dryer 3

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	The following emission limitations shall not be exceed: Particulate Emissions (PE) shall not exceed 0.011 pound per hour* and 0.045 ton per year*. Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.009 pound per hour* and 0.037 ton per year*. Organic Compound (OC) emissions shall not exceed 0.82 pound per hour from the thermal oxidizer or 2.52 pounds per hour* from the scrubber and 5.47 tons per year*. Sulfur Dioxide (SO2) emissions shall not exceed 0.0014 pound per hour* and 0.0062 ton per year*. Carbon Monoxide (CO) emissions shall not exceed 0.20 pound per hour* and 0.88 ton per year*. Nitrogen Oxide (NOx) emissions shall not exceed 0.33 pound per hour* and 1.44 tons per year*.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		* The hourly and ton per year emission limitations established are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. See c)(1) and c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-21-07(M)(2)	See b)(2)b. The requirements of this rule are more stringent than the OC control requirements established pursuant to OAC rule 3745-31-05(A)(3). The permittee shall comply with all applicable requirements (including any less stringent requirements) unless otherwise approved in b)(2)b.

(2) Additional Terms and Conditions

a. All of the OC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the OC emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. The permittee is subject to the general control requirement established in accordance with OAC rule 3745-21-07(M)(2), as effective February 18, 2008. Each article, machine, equipment or other contrivance identified in paragraph (M)(1) of this rule shall be equipped with a control system (i.e. capture and control equipment) that reduces the organic compound emissions from the

article, machine, equipment or other contrivance by an overall control efficiency of at least eighty-five percent, by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide. This general control requirement is effective until USEPA approves Ohio EPA's request to remove emissions unit P106 from the affected emissions unit list in OAC rule 3745-21-07(M)(1). This 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 3745-21-07(M)(1), the requirement to comply with the general control requirements still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the requested version of OAC rule 3745-21-07(M)(1), then the emission control measure no longer applies.

c) Operational Restrictions

(1) The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(2) The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Southwest Ohio Air Quality Agency of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The average temperature of the retention chamber of the thermal oxidizer for any 3-hour block of time when the emissions unit is in operation shall not be less than 1650 degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was below 1650 degrees Fahrenheit;

b. a log (date and total time) of the downtime of the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation; and

c. the hours of operation of the scrubber.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Whenever the monitored average combustion temperature within the thermal oxidizer is less than 1650 degrees Fahrenheit during any 3-hour block of time, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The temperature limit of 1650 degrees Fahrenheit as specified in c)(3) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: d)(1) - d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3-hour blocks of time during which the average temperature of the thermal oxidizer is less than 1650 degrees Fahrenheit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions 10 microns and less from emissions units P104 – P107 and P126 – P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting

requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Particulate Emissions (PE) shall not exceed 0.011 pound per hour and 0.045 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.009 pound per hour and 0.037 ton per year.

Applicable Compliance Method:

Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates) and multiplying by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 201 and 201 A of 40 CFR, Part 51, Appendix M.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 0.82 pound per hour from the thermal oxidizer or 2.52 pounds per hour from the scrubber and 5.47 tons per year.

Applicable Compliance Method:

Compliance with hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 6535 hrs/yr.

Compliance with hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor of 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 2225 hrs/yr (identified in c)(2)).

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Sulfur Dioxide (SO2) emissions shall not exceed 0.0014 pound per hour and 0.0062 ton per year.

Applicable Compliance Method:

Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 SO2 emission factor for natural gas (0.6 lbs of SO2/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitation:

Carbon Monoxide (CO) emissions shall not exceed 0.20 pound per hour and 0.88 ton per year.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 CO emission factor for natural gas (84 lbs of CO/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Nitrogen Oxide (NOx) emissions shall not exceed 0.33 pound per hour and 1.44 tons per year.

Applicable Compliance Method:

Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 NOx emission factor for natural gas (100 lbs of NOx/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit).

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for OC emissions in c)(1) and b)(2)a.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60 Appendix A, Methods 1-4, and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-07(M)(2), and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

7. P107, Milled Bar Soap Drying System No. 4, IS-21

Operations, Property and/or Equipment Description:

Soap Dryer 4

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	The following emission limitations shall not be exceed: Particulate Emissions (PE) shall not exceed 0.011 pound per hour* and 0.045 ton per year*. Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.009 pound per hour* and 0.037 ton per year*. Organic Compound (OC) emissions shall not exceed 0.82 pound per hour from the thermal oxidizer or 2.52 pounds per hour* from the scrubber and 5.47 tons per year*. Sulfur Dioxide (SO2) emissions shall not exceed 0.0014 pound per hour* and 0.0062 ton per year*. Carbon Monoxide (CO) emissions shall not exceed 0.20 pound per hour* and 0.88 ton per year*. Nitrogen Oxide (NOx) emissions shall not exceed 0.33 pound per hour* and 1.44 tons per year*.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		* The hourly and ton per year emission limitations established are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. See c)(1) and c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-21-07(M)(2)	See b)(2)b. The requirements of this rule are more stringent than the OC control requirements established pursuant to OAC rule 3745-31-05(A)(3). The permittee shall comply with all applicable requirements (including any less stringent requirements) unless otherwise approved in b)(2)b.

(2) Additional Terms and Conditions

a. All of the OC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the OC emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. The permittee is subject to the general control requirement established in accordance with OAC rule 3745-21-07(M)(2), as effective February 18, 2008. Each article, machine, equipment or other contrivance identified in paragraph (M)(1) of this rule shall be equipped with a control system (i.e. capture and control equipment) that reduces the organic compound emissions from the

article, machine, equipment or other contrivance by an overall control efficiency of at least eighty-five percent, by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide. This general control requirement is effective until USEPA approves Ohio EPA's request to remove emissions unit P107 from the affected emissions unit list in OAC rule 3745-21-07(M)(1). This 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 3745-21-07(M)(1), the requirement to comply with the general control requirements still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the requested version of OAC rule 3745-21-07(M)(1), then the emission control measure no longer applies.

c) Operational Restrictions

(1) The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(2) The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Southwest Ohio Air Quality Agency of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The average temperature of the retention chamber of the thermal oxidizer for any 3-hour block of time when the emissions unit is in operation shall not be less than 1650 degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was below 1650 degrees Fahrenheit;

b. a log (date and total time) of the downtime of the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation; and

c. the hours of operation of the scrubber.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Whenever the monitored average combustion temperature within the thermal oxidizer is less than 1650 degrees Fahrenheit during any 3-hour block of time, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The temperature limit of 1650 degrees Fahrenheit as specified in c)(3) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: d)(1) - d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3-hour blocks of time during which the average temperature of the thermal oxidizer is less than 1650 degrees Fahrenheit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions 10 microns and less from emissions units P104 – P107 and P126 – P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/2002: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Particulate Emissions (PE) shall not exceed 0.011 pound per hour and 0.045 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.009 pound per hour and 0.037 ton per year.

Applicable Compliance Method:

Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates) and multiplying by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 201 and 201A of 40 CFR, Part 51, Appendix M.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 0.82 pound per hour from the thermal oxidizer or 2.52 pounds per hour from the scrubber and 5.47 tons per year.

Applicable Compliance Method:

Compliance with hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 6535 hrs/yr.

Compliance with hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor of 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the oxidizer, 2225 hrs/yr (identified in c)(2)).

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Sulfur Dioxide (SO2) emissions shall not exceed 0.0014 pound per hour and 0.0062 ton per year.

Applicable Compliance Method:

Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 SO2 emission factor for natural gas (0.6 lbs of SO2/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitation:

Carbon Monoxide (CO) emissions shall not exceed 0.20 pound per hour and 0.88 ton per year.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 CO emission factor for natural gas (84 lbs of CO/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Nitrogen Oxide (NOx) emissions shall not exceed 0.33 pound per hour and 1.44 tons per year.

Applicable Compliance Method:

Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 NOx emission factor for natural gas (100 lbs of NOx/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104 – P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit).

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for OC emissions in c)(1) and b)(2)a.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60 Appendix A, Methods 1-4, and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-07(M)(2), and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

8. P122, Bar Soap Making System #6, IS-52

Operations, Property and/or Equipment Description:

Bar soap production

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) d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install # 14-04960, issued 07/20/2000)	Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.42 pound per hour* and 1.84 tons per year*. Organic compound (OC) emissions shall not exceed 1.55 pounds per hour* and 37.2 pounds per day* and 6.81 tons per year.* * The hourly, daily and annual emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no recordkeeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the baghouse (IS-52a) according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse (IS-52a) is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range,

corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with c)(2), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The range or limit on the pressure drop across the baghouse in c)(2) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) The permit to install and operate (PTIO) for this emissions unit P122 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's

"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Confidential

TLV (ug/m3): 5000

Maximum Hourly Emission Rate (lbs/hr): 2.38 (combined for P122 & P125)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.57

MAGLC (ug/m3): 119

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification"

under other provisions of the rule, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04960, issued on 7/20/2000: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04960, issued on 7/20/2000: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.42 pound per hour and 1.84 tons per year.

Applicable Compliance Method:

Compliance with the hourly PE/PM10 emissions limitation shall be demonstrated as follows:

The PE/PM10 emissions from the dry soap receivers/surge bins are determined by multiplying the maximum uncontrolled emissions of 363.56 lbs/hr by the baghouse control efficiency of 99.9%.

363.56 lbs PE/PM10/hr x (1 – 0.999) = 0.364 lb PE/PM10/hr

The PE/PM10 emissions from the dye preparation/mixing are determined by multiplying the maximum uncontrolled emissions of 5.14 lbs/hr by the baghouse control efficiency of 99.9%.

5.14 lbs PE/PM10/hr x (1 – 0.999) = 0.0514 lb PE/PM10/hr

Add the PE/PM10 emission from the dye preparation/mixing to the PE/PM10 emissions from the dry soap receivers/surge bins.

0.364 lb PE/PM10/hr + 0.0514 lb PE/PM10/hr = 0.42 lb PE/PM10/hr

(The emission factors are based on the material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hours per year and dividing by 2000 pounds per ton.

If required, compliance with the pound per hour emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, Method 5 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.55 pounds per hour* and 37.2 pounds per day* and 6.81 tons per year.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated as follows:

The OC emissions from the surge bins are determined by multiplying the maximum production rate of 9765 pounds per hour, by the emission factor, 0.085 pound of OC per 1000 pounds of soap produced.

9765 lb/hr production x 0.085 lb of OC/1000 lbs of soap = 0.83 lb OC/hr

The OC emissions from making system 6 is determined by multiplying the maximum production rate, 9765 pounds per hour, by the emission factor, 0.074 pound per 1000 pounds of soap produced.

9765 lb/hr production x 0.074 lb of OC/1000 lbs of soap = 0.72 lb OC/hr

Add the OC emissions from the surge bins to the making system 6 OC emissions.

0.83 lb OC/hr + 0.72 lb OC/hr = 1.55 OC/hr

(This emission factor is based on the material balance and the permittee's process knowledge.)

The daily emissions are determined by multiplying the total hourly rate by 24 hours per day.

The annual emissions are determined by multiplying the hourly rate by 8760 hours per year and dividing by 2000 pounds per ton.

If required, compliance with the pound per hour emission limitation shall be demonstrated by stack testing conducted in accordance with Method 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-04960, issued on 7/20/2000: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

9. P125, Bar Soap Packing Line E, IS-52

Operations, Property and/or Equipment Description:

Packing Line E

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) d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install # 14-05755, issued 08/30/2005)	Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.067 pound per hour* and 0.30 ton per year*. Organic compound (OC) emissions shall not exceed 1.05 pounds per hour* and 25.2 pounds per day* and 4.6 tons per year*. See c)(1) and c)(2). * The hourly, daily and annual emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no hourly or daily recordkeeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the baghouse according to the manufacturers' specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 10 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range,

corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The range or limit on the pressure drop across the baghouse in c)(2) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) The permit to install and operate (PTIO) for this emissions unit P125 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's

"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: diethyl phthalate

TLV (ug/m3): 5000

Maximum Hourly Emission Rate (lbs/hr): 1.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.4

MAGLC (ug/m3): 119

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification"

under other provisions of the rule, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05755, issued on 8/30/2005: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05755, issued on 8/30/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.067 pound per hour* and 0.30 ton per year*.

Applicable Compliance Method:

The PE limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05755 submitted on August 3, 2005.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hours per year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

It shall be assumed that all PE is PM10.

If required, compliance with the pound per hour emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, Method 5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.05 pounds per hour* and 25.2 pounds per day* and 4.6 tons per year.

Applicable Compliance Method:

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05755 submitted on August 3, 2005.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours per year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05755, issued on 8/30/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

10. P126, Soap Mix Tank No. 1

Operations, Property and/or Equipment Description:

Soap Mixing Tank #1

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 1.59 pound per hour* and 3.19 tons per year. Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 1.3 pounds per hour* and 2.61 tons per year. Organic compound (OC) emissions shall not exceed 0.017 pound per hour* and 0.074 ton per year*. *The hourly emission limitations and annual OC emission limitation outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no recordkeeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a rotoclone at all times the emissions unit is in operation. The rotoclone shall control at least 90% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

(1) The maximum annual operating hours for the bag dump station in this emissions unit shall not exceed 4000 hours, based upon a rolling, 12 month summation of the operating hours.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. A log or record of operating time for each bag dump station.

b. The updated rolling, 12 month summation of the operating hours for each bag dump station in the soap mixing tank for this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month operating hours limitation for the bag dump station in term c)(1).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year*; and

b. The total OC and PM emissions from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 1.59 pound per hour* and 3.19 tons per year.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the confidential application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (15.94 pounds per hour) by the rotoclone control efficiency of 90%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (1.59 lb/hr) by the maximum annual hours of operation (4000 hours), and then dividing by 2,000 pounds per ton.

Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 1.3 pounds per hour* and 2.61 tons per year.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multplying the maximum hourly PE rate of 1.59 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (1.3 lb/hr) by the maximum annual hours of operation (4000 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic compound (OC) emissions shall not exceed 0.017 pound per hour* and 0.074 ton per year*.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor and process information supplied with the confidential application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate by the facility provided emission factor.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.017 lb/hr) by the maximum annual hours of operation (8760 hours for tank mixing), and then dividing by 2,000 pounds per

ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

11. P127, Soap Mix Tank No. 3

Operations, Property and/or Equipment Description:

Soap Mixing Tank #3

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 1.59 pound per hour* and 3.19 tons per year. Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 1.3 pounds per hour* and 2.61 tons per year. Organic compound (OC) emissions shall not exceed 0.011 pound per hour* and 0.048 ton per year*. * The hourly emission limitations and annual OC emission limitation outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no recordkeeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a rotoclone at all times the emissions unit is in operation. The rotoclone shall control at least 90% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

(1) The maximum annual operating hours for the bag dump station in this emissions unit shall not exceed 4000 hours, based upon a rolling, 12 month summation of the operating hours.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. A log or record of operating time for each bag dump station.

b. The updated rolling, 12 month summation of the operating hours for each bag dump station in the soap mixing tank for this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month operating hours limitation for the bag dump station in term c)(1).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year*; and

b. The total OC and PM emissions from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 1.59 pound per hour* and 3.19 tons per year.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the confidential application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (15.94 pounds per hour) by the rotoclone control efficiency of 90%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (1.59 lb/hr) by the maximum annual hours of operation (4000 hours), and then dividing by 2,000 pounds per ton.

Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 1.3 pounds per hour* and 2.61 tons per year.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multplying the maximum hourly PE rate of 1.59 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (1.3 lb/hr) by the maximum annual hours of operation (4000 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic compound (OC) emissions shall not exceed 0.011 pound per hour* and 0.048 ton per year*.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor and process information supplied with the confidential application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate by the facility provided emission factor.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.011 lb/hr) by the maximum annual hours of operation (8760 hours of tank mixing), and then dividing by 2,000 pounds per

ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

12. P128, Soap Mix Tank No. 4

Operations, Property and/or Equipment Description:

Soap Mixing Tank #4

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 1.59 pound per hour* and 3.19 tons per year. Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.3 pounds per hour* and 2.61 tons per year. Organic compound (OC) emissions shall not exceed 0.011 pound per hour* and 0.048 ton per year. *The hourly emission limitations and annual OC emission limitation outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no recordkeeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a rotoclone at all times the emissions unit is in operation. The rotoclone shall control at least 90% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

(1) The maximum annual operating hours for the bag dump station in this emissions unit shall not exceed 4000 hours, based upon a rolling, 12 month summation of the operating hours.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. A log or record of operating time for each bag dump station.

b. The updated rolling, 12 month summation of the operating hours for each bag dump station in the soap mixing tank for this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month operating hours limitation for the bag dump station in term c)(1).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year*; and

b. The total OC and PM emissions from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 1.59 pound per hour* and 3.19 tons per year.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the confidential application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (15.94 pounds per hour) by the rotoclone control efficiency of 90%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (1.59 lb/hr) by the maximum annual hours of operation (4000 hours), and then dividing by 2,000 pounds per ton.

Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.3 pounds per hour* and 2.61 tons per year.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multplying the maximum hourly PE rate of 1.59 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (1.3 lb/hr) by the maximum annual hours of operation (4000 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic compound (OC) emissions shall not exceed 0.011 pound per hour* and 0.048 ton per year*.

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor and process information supplied with the confidential application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate by the facility provided emission factor.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.011 lb/hr) by the maximum annual hours of operation (8760 hours of tank mixing), and then dividing by 2,000 pounds per

ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

13. P129, Flake Bin 1/2

Operations, Property and/or Equipment Description:

Flake Bin 1/2

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 0.13 lb per hour* and 0.55 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.11 lb per hour* and 0.45 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.013 lb per hour* and 0.057 ton per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. There shall be no visible particulate emissions from any stack associated with this emissions unit.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(1). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or

usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(1) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(1) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(1) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 0.13 lb per hour* and 0.55 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (125 pounds per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.13 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.11 lb per hour* and 0.45 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multplying the maximum hourly PE rate of 0.13 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.11 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 0.013 lb per hour* and 0.057 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.001 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 13,000 lbs/hr, by the emission factor of 0.001 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.013 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

There shall be no visible particulate emissions from any stack associated with this emissions unit.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

14. P130, Bar Soap Making System #1

Operations, Property and/or Equipment Description:

Bar Soap Making System #1

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 1.91 lb per hour* and 8.36 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.56 lb per hour* and 6.84 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.01 lb per hour* and 4.40 ton per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouses IS-1C, IS-24b and IS-24c at all times the emissions unit is in operation. The fabric filters shall control at least 99.9% of the particulate matter emissions produced in this emissions unit and a cyclone (when employed) shall control at least 90% of the particulate matter emissions.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate each cyclone and baghouse according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across each baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in

d)(2). The baghouse indicator range for the pressure drop across each baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across a baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouses;

b. each period of time (start time and date, and end time and date) when the pressure drop across any of the three baghouses was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 1.91 lb per hour and 8.36 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate of 18 pounds per hour by the cyclone control efficiency of 90% which equals 1.8 pounds per hour, then multiply the maximum uncontrolled hourly PE rate of 109.72 pounds per hour by the baghouse control efficiency of 99.9% which equals 0.109 pounds per hour. Add the cyclone emissions to the baghouse emissions to get 1.91 pounds per hour.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (1.91 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.56 lb per hour and 6.84 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly PE rate of 1.91 lbs/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (1.56 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 1.01 lb per hour* and 4.40 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.120 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.120 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (1.01 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

15. P131, Bar Soap Making System #2

Operations, Property and/or Equipment Description:

Bar Soap Making System #2

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 1.91 lb per hour* and 8.36 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.56 lb per hour* and 6.84 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.01 lb per hour* and 4.40 ton per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouses IS-1C, IS-24b and IS-24c at all times the emissions unit is in operation. The fabric filters shall control at least 99.9% of the particulate matter emissions produced in this emissions unit and a cyclone (when employed) shall control at least 90% of the particulate matter emissions.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate each cyclone and baghouse according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across each baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in

d)(2). The baghouse indicator range for the pressure drop across each baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across a baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouses;

b. each period of time (start time and date, and end time and date) when the pressure drop across any of the three baghouses was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 1.91 lb per hour and 8.36 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate of 18 pounds per hour by the cyclone control efficiency of 90% which equals 1.8 pounds per hour, then multiply the maximum uncontrolled hourly PE rate of 109.72 pounds per hour by the baghouse control efficiency of 99.9% which equals 0.109 pounds per hour. Add the cyclone emissions to the baghouse emissions to get 1.91 pounds per hour.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (1.91 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 1.56 lb per hour and 6.84 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly PE rate of 1.91 lbs/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (1.56 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 1.01 lb per hour* and 4.40 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.120 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.120 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (1.01 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

16. P132, Bar Soap Making System #3

Operations, Property and/or Equipment Description:

Bar Soap Making System #3

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 0.24 lb per hour* and 1.0 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.2 lb per hour* and 0.82 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.8 lb per hour* and 3.5 tons per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse shall control at least 99.9% of the particulate matter emissions produced in this emissions unit and a cyclone (if employed) shall control at least 90% of the particulate matter emissions from the addition of minor dry additives.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the cyclone and baghouse according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is

specified in c)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 0.24 lb per hour and 1.0 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (240 pounds per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.24 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.2 lb per hour and 0.82 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly PE rate of 0.24 lbs/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.2 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 0.8 lb per hour and 3.5 tons per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.095 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.8 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

17. P133, Bar Soap Making System #4

Operations, Property and/or Equipment Description:

Bar Soap Making System #4

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 0.30 lb per hour* and 1.26 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.25 lb per hour* and 1.03 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.8 lb per hour* and 3.5 tons per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouse IS-28 at all times the emissions unit is in operation. The fabric filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit and a cyclone (if employed) shall control at least 90% of the particulate matter emissions from the addition of minor dry additives.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate each cyclone and baghouse according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range,

corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 0.30 lb per hour and 1.26 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (286 pounds per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.30 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.25 lb per hour and 1.03 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly PE rate of 0.30 lbs/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.25 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 0.8 lb per hour and 3.5 tons per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.095 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.8 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

18. P135, Packing Line A

Operations, Property and/or Equipment Description:

Bar Soap Packing System A

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(1). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air

pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(1) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(1) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(1) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (90 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.09 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the multplying

the maximum hourly PE rate of 0.09 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.074 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 0.80 lb per hour and 3.50 tons per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.095 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.80 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

19. P136, Packing Line B

Operations, Property and/or Equipment Description:

Bar Soap Packing System B

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(A)(3) (Permit to Install #14-04662, issued on 12/03/1998)	Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.10 lb per hour* and 0.44 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.05 lb per hour* and 4.6 tons per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. There shall be no visible particulate emissions from any stack associated with this emissions unit.
b.	OAC rule 3745-17-07(A)(1)	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.	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(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouses IS-52a and IS-28 at all times the emissions unit is in operation. The baghouse filters shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across each baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across each baghouse is specified in c)(1). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across a baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the

cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(1) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04662, issued on 12/3/1998: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to a baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across a baghouse was outside of the range specified in c)(1) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(1) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04662, issued on 12/3/1998: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.10 lb per hour* and 0.44 ton per year*(TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the confidential application for PTI 14-04662, submitted 10/22/1998. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (99.4 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.10 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

PM10 emissions shall be assumed to be equivalent to the particulate emission rate.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 1.05 lb per hour* 25.2 lbs per day* and 4.6 tons per year* (TPY).

Applicable Compliance Methods:

The hourly and daily emission limitations are based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.095 lb of OC/1000 lbs of soap and process information supplied with the confidential application for PTI 14-04662, submitted 10/22/1998.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (1.05 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

There shall be no visible particulate emissions from any stack associated with this emissions unit.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04662, issued on 12/3/1998: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

20. P137, Packing Line C

Operations, Property and/or Equipment Description:

Bar Soap Packing System C

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(1). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air

pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(1) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(1) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(1) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (90 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.09 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the multplying

the maximum hourly PE rate of 0.09 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.074 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 0.80 lb per hour and 3.50 tons per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.095 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.80 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

21. P138, Packing Line D

Operations, Property and/or Equipment Description:

Bar Soap Packing System D

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(1). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air

pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(1) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(1) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(1) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (80 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.08 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the multplying

the maximum hourly PE rate of 0.08 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.065 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 0.80 lb per hour and 3.50 tons per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.095 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.80 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

22. P139, Packing Line F

Operations, Property and/or Equipment Description:

Bar Soap Packing System F

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(A)(3) (Permit to Install #14-03870, issued on 9/26/2002)	Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(1). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air

pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(1) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03870, issued on 9/26/2002: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(1) and the cause of each incident;

c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(1) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) The permittee shall submit annual reports which include the following information:

a. a summary of all exceedances reported during the year*; and

b. the total OC, PE, and PM10 emissions, in TPY, from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

* Compliance with the exceedance summary report may be demonstrated by including this information in the Annual Compliance Certification report specified in the Standard Terms and Conditions, Section A.13.d).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03870, issued on 9/26/2002: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (80 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.08 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the multplying

the maximum hourly PE rate of 0.08 lb/hr, by 0.815 (PM10 is assumed to be 81.5% of PE).

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.065 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 0.80 lb per hour and 3.50 tons per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.095 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-03870, submitted 4/23/1997. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.80 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable compliance method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03870, issued on 9/26/2002: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

23. P145, Milled Bar Soap Making System #5

Operations, Property and/or Equipment Description:

Making System 5

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) d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install 14-04997, issued on 08/25/05)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.35 lb per hour* and 1.52 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.05 lb per hour*, 25.2 lbs/day and 4.6 tons per year* (TPY). *The hourly, daily and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouse IS-53 at all times the emissions unit is in operation. The baghouse filters shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the baghouse in accordance with the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is 1-10 Inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range,

corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the ranges established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) The permit to install and operate (PTIO) for this emissions unit P145 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level

Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: diethyl phthalate

TLV (ug/m3): 5000

Maximum Hourly Emission Rate (lbs/hr): 1.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.4

MAGLC (ug/m3): 119

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04997, issued on 08/25/2005: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04997, issued on 08/25/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.35 lb per hour and 1.52 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-04997, submitted 08/09/2005. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (346 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.35 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

PM10 emissions shall be assumed to be equivalent to the particulate emission rate.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

Organic Compound (OC) emissions shall not exceed 1.05 lb per hour*, 25.2 lbs/day and 4.6 tons per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor of 0.125 lb of OC/1000 lbs of soap and process information supplied with the application for PTI 14-04997, submitted 08/09/2005. This emission limitation was established by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.125 lb of OC/1000 lbs of soap.

The daily emission rate was determined by multiplying the hourly emission rate by 24 hours/day.

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (1.05 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-04997, issued on 08/25/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

24. P150, Bulk Dry Majors Storage Silo, IS-25d

Operations, Property and/or Equipment Description:

Dry material storage silo

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(A)(3) (Permit to Install 14-05194, issued on 08/16/2001)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.06 lb per hour* and 0.26 ton per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouse IS-25d at all times the emissions unit is in operation. The baghouse filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between .05 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(1). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(1) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) The permittee shall perform an inspection of the collection and control system on a weekly basis. The purpose of this inspection is to ensure its proper functioning. At a minimum, this inspection shall include a visible check of the hood and duct systems leading to the baghouse, the presence of fugitive visible emissions and a check for the presence of visible emissions from the stack associated with this emissions unit. The results of this inspection shall be recorded in a log book. Any problems noted during the inspection and the corrective action to remedy the problem should also be noted in the log book.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05194, issued on 08/16/2001: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(1) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator range defined in c)(1) into an acceptable range, was determined to be necessary and was not taken;

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s); and

h. any week when the inspection of the collection and control system does not take place and the reason for not performing the inspection.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05194, issued on 08/16/2001: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.06 lb per hour and 0.26 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-05194, submitted 07/16/2001. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (60 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.06 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

PM10 emissions shall be assumed to be equivalent to the particulate emission rate.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05194, issued on 08/16/2001: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

25. P151, Bulk Dry Majors Use Bin 1/2, IS-25e

Operations, Property and/or Equipment Description:

Dry material use bin

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(A)(3) (Permit to Install P0116097, issued on 01/29/2014)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.004 lb per hour* and 0.018 ton per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
c.	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(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to cartridge filter IS-25e at all times the emissions unit is in operation. The cartridge filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform quarterly inspections of the cartridge filter controlling this emissions unit. At a minimum, these quarterly inspections shall include the following:

a. A visual leak check of the duct work leading to the cartridge filter controlling this emissions unit.

b. A visual inspection of the cartridge filter to look for holes, punctures, perforations or any other indication of problems leading to the filter no functioning properly.

c. A check of any visible emissions exiting the cartridge filter.

The permittee shall collect and record the results of this inspection in a log book. If any problems are noted during the quarterly inspection, the measures taken to correct the problem shall be noted.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow for any visible particulate emissions form the cartridge filter serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The location and color of the emissions.

b. The total duration of any visible emission incident.

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

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0116097, issued on 01/29/2014: d)(1) - d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record

keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the cartridge filter;

b. an identification of each incident where the quarterly visual inspection of the cartridge filter was not conducted;

c. the corrective action(s) taken for each incident described in (a) and (b);

d. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance was determined to be necessary and was not taken; and

e. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit semiannual written reports that identify the following:

a. All days during which any visible particulate emissions were observed from the cartridge filter serving this emissions unit; and

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

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0116097, issued on 01/29/2014: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.004 lb per hour* and 0.018 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-05194, submitted 07/16/2001. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (4 lbs per hour) by the cartridge filter control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.004 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0116097, issued on 01/29/2014: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

26. P152, Bulk Dry Majors Use Bin 3/4, IS-25f

Operations, Property and/or Equipment Description:

Dry material use bin

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(A)(3) (Permit to Install P0116097, issued on 01/29/2014)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.007 lb per hour* and 0.031 ton per year* (TPY). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
c.	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(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to cartridge filter IS-25f at all times the emissions unit is in operation. The cartridge filter shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform quarterly inspections of the cartridge filter controlling this emissions unit. At a minimum, these quarterly inspections shall include the following:

a. A visual leak check of the duct work leading to the cartridge filter controlling this emissions unit.

b. A visual inspection of the cartridge filter to look for holes, punctures, perforations or any other indication of problems leading to the filter no functioning properly.

c. A check of any visible emissions exiting the cartridge filter.

The permittee shall collect and record the results of this inspection in a log book. If any problems are noted during the quarterly inspection, the measures taken to correct the problem shall be noted.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow for any visible particulate emissions form the cartridge filter serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The location and color of the emissions.

b. The total duration of any visible emission incident.

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

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0116097, issued on 01/29/2014: d)(1) - d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record

keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the cartridge filter;

b. an identification of each incident where the quarterly visual inspection of the cartridge filter was not conducted;

c. the corrective action(s) taken for each incident described in (a) and (b);

d. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance was determined to be necessary and was not taken; and

e. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall submit semiannual written reports that identify the following:

a. All days during which any visible particulate emissions were observed from the cartridge filter serving this emissions unit; and

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

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0116097, issued on 01/29/2014: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.007 lb per hour* and 0.031 ton per year* (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-05194, submitted 07/16/2001. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (7 lbs per hour) by the cartridge filter control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.007 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0116097, issued on 01/29/2014: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

27. P153, Vacuum Dryer No. 2, IS-54

Operations, Property and/or Equipment Description:

Vacuum Dryer Number 2

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) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install 14-05770, issued on 11/15/2005)	Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year*. See c)(1) – c)(3). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a wet scrubber and condenser at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

(1) The permittee shall maintain and operate the wet scrubber and condenser according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the average scrubber liquid flow rate, for any 3-hour block of time, shall not be less than 25 gallons per minute or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The average temperature of the exhaust gases from the condenser, for any 3-hour block of time when the emission unit controlled by the condenser is in operation, shall not exceed 100 degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day while this emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Whenever the monitored temperature of the exhaust gases from the condenser deviates from the range/limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was deviation;

j. the temperature readings of the exhaust gas from condenser immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05770, issued on 11/15/2005: d)(1) - d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the liquid flow rate was outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

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

a. all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limit specified in c)(3);

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the condenser into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05770, issued on 11/15/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year.

Applicable Compliance Method:

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05770 submitted on September 20, 2005.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05770, issued on 11/15/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) 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 PTI 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

28. P154, Vacuum Dryer No. 3, IS-55

Operations, Property and/or Equipment Description:

Vacuum Dryer Number 3

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) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install 14-05770, issued on 11/15/2005)	Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year*. See c)(1) – c)(3). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a wet scrubber and condenser at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

(1) The permittee shall maintain and operate the wet scrubber and condenser according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the average scrubber liquid flow rate, for any 3-hour block of time, shall not be less than 25 gallons per minute or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The average temperature of the exhaust gases from the condenser, for any 3-hour block of time when the emission unit controlled by the condenser is in operation, shall not exceed 100 degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubber liquid flow rate (in gallons per minute during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day while this emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Whenever the monitored temperature of the exhaust gases from the condenser deviates from the range/limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was deviation;

j. the temperature readings of the exhaust gas from condenser immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05770, issued on 11/15/2005: d)(1) - d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the liquid flow rate was outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

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

a. all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limit specified in c)(3);

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the condenser into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05770, issued on 11/15/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year.

Applicable Compliance Method:

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05770 submitted on September 20, 2005.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05770, issued on 11/15/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) 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 PTI 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

29. P155, Minor Additions Systems 1 and 2, IS-56

Operations, Property and/or Equipment Description:

Minor Additions System 1 and 2

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(A)(3) (Permit to Install 14-05770, issued on 11/15/2005)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.17 lb per hour* and 0.75 ton per year* (TPY). The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average. See c)(1) and c)(2). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations.
b.	OAC rule 3745-17-07(A)(1)	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.	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(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouse IS-56 at all times the emissions unit is in operation. The baghouse shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the baghouse (IS-56) in accordance with the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 10 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or

usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05770, issued on 11/15/2005: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator range defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05770, issued on 11/15/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.17 lb per hour and 0.75 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-05770, submitted 09/20/2005. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (171.4 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.17 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

PM10 emissions shall be assumed to be equivalent to the particulate emission rate.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05770, issued on 11/15/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

30. P156, Making/Packing Line 7-G, IS-57

Operations, Property and/or Equipment Description:

Making/Packing Line 7-G

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) d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install 14-05770, issued on 11/15/2005)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.18 lb per hour* and 0.77 ton per year* (TPY). Organic compound (OC) emissions shall not exceed 2.75 pounds per hour and 12.05 tons per year. The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average. See c)(1) and c)(2). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouse IS-57 at all times the emissions unit is in operation. The baghouse shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the baghouse (IS-57) in accordance with the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 10 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range,

corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) The permit to install and operate (PTIO) for emissions units P156, P157 and P158 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy (“Air Toxic Policy”) was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable

Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: benzyl acetate

TLV (ug/m3): 61,423

Maximum Hourly Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 441

MAGLC (ug/m3): 1462

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05770, issued on 11/15/2005: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator range defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05770, issued on 11/15/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.18 lb per hour and 0.77 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-05770, submitted 09/20/2005. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (176 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.18 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

PM10 emissions shall be assumed to be equivalent to the particulate emission rate.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.75 pounds per hour and 12.05 tons per year.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 11,000 lbs/hr, by the emission factor of 0.250 lb of OC/1000 lbs of soap.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-5770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05770, issued on 11/15/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

31. P157, Making/Packing Line 8-H, IS-58

Operations, Property and/or Equipment Description:

Making/Packing Line 8-H

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) d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install 14-05770, issued on 11/15/2005)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.18 lb per hour* and 0.77 ton per year* (TPY). Organic compound (OC) emissions shall not exceed 2.75 pounds per hour and 12.05 tons per year. The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average. See c)(1) and c)(2). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouse IS-58 at all times the emissions unit is in operation. The baghouse shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the baghouse in accordance with the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 10 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range,

corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) The permit to install and operate (PTIO) for emissions units P156, P157 and P158 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy (“Air Toxic Policy”) was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable

Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: benzyl acetate

TLV (ug/m3): 61,423

Maximum Hourly Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 441

MAGLC (ug/m3): 1462

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05770, issued on 11/15/2005: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator range defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05770, issued on 11/15/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.18 lb per hour and 0.77 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-05770, submitted 09/20/2005. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (176 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.18 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

PM10 emissions shall be assumed to be equivalent to the particulate emission rate.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.75 pounds per hour and 12.05 tons per year.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 11,000 lbs/hr, by the emission factor of 0.250 lb of OC/1000 lbs of soap.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-5770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05770, issued on 11/15/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

32. P158, Making/Packing Line 9-I, IS-59

Operations, Property and/or Equipment Description:

Making/Packing Line 9-I

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) d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Permit to Install 14-05770, issued on 11/15/2005)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.11 lb per hour* and 0.48 ton per year* (TPY). Organic compound (OC) emissions shall not exceed 1.75 pounds per hour and 7.67 tons per year. The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average. See c)(1) and c)(2). *The hourly and annual emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., c)(1), c)(2), d)(1) – d)(4), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to baghouse IS-59 at all times the emissions unit is in operation. The baghouse shall control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) The permittee shall maintain and operate the baghouse in accordance with the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 10 inches of water.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(2). The baghouse indicator range for the pressure drop across the baghouse is specified in c)(2). When the monitored value for pressure drop is outside of this range,

corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with c)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(5) The permit to install and operate (PTIO) for emissions units P156, P157 and P158 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy (“Air Toxic Policy”) was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable

Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: benzyl acetate

TLV (ug/m3): 61,423

Maximum Hourly Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 441

MAGLC (ug/m3): 1462

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05770, issued on 11/15/2005: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in c)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator range defined in c)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(4) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05770, issued on 11/15/2005: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.11 lb per hour and 0.48 ton per year (TPY).

Applicable Compliance Methods:

The hourly emission limitation is based on the emissions unit's potential to emit and the permittee-supplied emission factor based upon material balance and process information supplied with the application for PTI 14-05770, submitted 09/20/2005. This emission limitation was established by multiplying the maximum uncontrolled hourly PE rate (109 lbs per hour) by the baghouse control efficiency of 99.9%.

The ton per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.11 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

PM10 emissions shall be assumed to be equivalent to the particulate emission rate.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.75 pounds per hour and 7.67 tons per year.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 11,000 lbs/hr, by the emission factor of 0.159 lb of OC/1000 lbs of soap.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-5770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

The visible PE from any stack associated with this emissions unit shall not exceed 10% opacity, as a six minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05770, issued on 11/15/2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

33. P159, Soap Reclaim IS-60

Operations, Property and/or Equipment Description:

Dried Soap Reclaim Process IS-60

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(A)(3) (Permit to Install 14-05995, issued on 02/28/2008)	Volatile Organic Compound (VOC) emissions shall not exceed 125 pounds per hour.* *The hourly emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
b.	OAC rule 3745-31-05(C) Synthetic Minor to avoid Non-Attainment New Source Review	The VOC emissions shall not exceed 26.0 tons per year based upon a rolling, 12-month summation. See c)(1).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum annual dried soap throughput for this emissions unit shall not exceed 3,467,000 pounds of dried soap, based upon a rolling, 12-month summation of the dried soap throughput rates.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

(2) The amount of residual perfume contained within the dried soap processed in this emission unit shall not exceed 1.5 percent.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

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

a. The dried soap throughput for each month.

b. The percentage of residual perfume contained within the dried soap.

c. The rolling 12-month summation of the dried soap throughput.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(C))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05995, issued on 02/28/2008: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 - month dried soap throughput limitation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(C))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(C))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05995, issued on 02/28/2008: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Volatile Organic Compound (VOC) emissions shall not exceed 125 pounds per hour.

Applicable Compliance Method:

The VOC emission limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05995 submitted on October 22, 2007. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The hourly VOC emission limitation was developed by multiplying the amount of dried throughput per batch (100,000 pounds per batch) by the percentage of residual perfume (1.5 percent) then dividing by the number of hours in the re-boiling cycle (12 hours), as provided in permit to install application 14-05995 submitted on October 22, 2007.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

The VOC emissions shall not exceed 26.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

The rolling, 12-month VOC emission limitation shall be demonstrated by multiplying the amount of dried soap throughput by the percentage of residual perfume in the dried soap and dividing by 2000 pounds/ton.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(C))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05995, issued on 02/28/2008: f)(1). The testing requirements contained in the

above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

34. P160, Line U-1 (IS-62)

Operations, Property and/or Equipment Description:

Making/Packing Line U-1 (IS-62)

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(A)(3), as effective 11/30/01 (Permit to Install P0113348, issued on 03/18/13)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.12 pound per hour and 0.54 ton per year. Volatile organic compound (VOC) emissions shall not exceed 1.55 pounds per hour and 6.79 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(C) Voluntary restriction to avoid Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	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(C).
f.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)d., d)(1) – d)(5), e)(1), and e)(2).

(2) Additional Terms and Conditions

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

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

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

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

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c. Permit to Install P0113348 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.54 ton per year.

ii. The emissions from this emissions unit shall be vented to a baghouse with a control efficiency of 99.9% at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(C))

d. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(3). The baghouse indicator range for the pressure drop across the baghouse is specified in d)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(3) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with d)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(5) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0113348, issued on 03/08/2013: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in d)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator range defined in d)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(5) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0113348, issued on 03/08/2013: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

PE and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.12 pound per hour and 0.54 ton per year.

Applicable Compliance Method:

Emissions from the baghouse are determined by multiplying the maximum uncontrolled particulate emissions vented to the baghouse of 123.4 pounds per hour by the baghouse control efficiency of 99.9%.

123.4 pounds of PE/PM10 x (1-0.999) = 0.12 pound of PE per hour.

The PE/PM10 limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number P0104582 submitted on March 4, 2009. If required, compliance with the PE/PM10 limit shall be demonstrated by emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual PE/PM10 limitation was developed by multiplying the hour PE/PM10 limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

VOC emission shall not exceed 1.55 pounds per hour and 6.79 tons per year.

Applicable Compliance Method:

The hourly emission rate of 1.55 pounds per hour is determined by multiplying the company derived emission factor of 0.250 pound of VOC per 1000 pounds of soap per hour by the maximum process weight of 6200 pounds per hour. The annual emission rate is determined by multiplying the hourly emission rate by the total number of hours the emissions unit operated during the calendar year then dividing by 2000.

The annual emission limitation is determined by multiplying the hourly limit (1.55 lbs/hr) by the maximum annual hours of operation (8760 hours/year) then dividing by 2000 lbs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable compliance method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0113348, issued on 03/08/2013: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

35. P161, Line U-2 (IS-63)

Operations, Property and/or Equipment Description:

Making/Packing Line U-2 (IS-63)

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(A)(3), as effective 11/30/01 (Permit to Install P0113348, issued on 03/18/13)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.12 pound per hour and 0.54 ton per year. Volatile organic compound (VOC) emissions shall not exceed 1.55 pounds per hour and 6.79 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(C) Voluntary restriction to avoid Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	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(C).
f.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)d., d)(1) – d)(5), e)(1), and e)(2).

(2) Additional Terms and Conditions

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

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

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

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

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

c. Permit to Install P0113348 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.54 ton per year.

ii. The emissions from this emissions unit shall be vented to a baghouse with a control efficiency of 99.9% at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(C))

d. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(3). The baghouse indicator range for the pressure drop across the baghouse is specified in d)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.7)

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 8 inches of water.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

(3) The permittee shall operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with d)(2) of this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of an deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was an deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

(4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, 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. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

(5) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be

required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0113348, issued on 03/08/2013: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in d)(2) and the cause of each incident;

c. the date, time, and duration of any downtime of baghouse continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;

d. the corrective action(s) taken for each incident described in (a) and (b);

e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;

f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator range defined in d)(2) into an acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.9)

(2) If the permittee is required under 40 CFR Part 64.8 and d)(5) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0113348, issued on 03/08/2013: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

PE and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.12 pound per hour and 0.54 ton per year.

Applicable Compliance Method:

Emissions from the baghouse are determined by multiplying the maximum uncontrolled particulate emissions vented to the baghouse of 123.4 pounds per hour by the baghouse control efficiency of 99.9%.

123.4 pounds of PE/PM10 x (1-0.999) = 0.12 pound of PE per hour.

The PE/PM10 limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number P0104582 submitted on March 4, 2009. If required, compliance with the PE/PM10 limit shall be demonstrated by emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual PE/PM10 limitation was developed by multiplying the hour PE/PM10 limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

VOC emission shall not exceed 1.55 pounds per hour and 6.79 tons per year.

Applicable Compliance Method:

The hourly emission rate of 1.55 pounds per hour is determined by multiplying the company derived emission factor of 0.250 pound of VOC per 1000 pounds of soap per hour by the maximum process weight of 6200 pounds per hour. The annual emission rate is determined by multiplying the hourly emission rate by the total number of hours the emissions unit operated during the calendar year then dividing by 2000.

The annual emission limitation is determined by multiplying the hourly limit (1.55 lbs/hr) by the maximum annual hours of operation (8760 hours/year) then dividing by 2000 lbs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable compliance method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0113348, issued on 03/08/2013: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

36. P162, Soap Bin 10 (IS-61)

Operations, Property and/or Equipment Description:

Soap Bin 10 (IS-61)

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(A)(3), as effective 11/30/01 (Permit to Install P0113348, issued on 03/18/13)	Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.08 pound per hour and 0.36 ton per year. See b)(2)a.
b.	OAC rule 3745-31-05(C) Voluntary restriction to avoid Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
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(C).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality

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

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

b. Permit to Install P0113348 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.36 ton per year.

ii. The emissions from this emissions unit shall be vented to a baghouse with a control efficiency of 99.9% at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(C))

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action;

f. the date corrective action was completed;

g. the date and time the deviation ended;

h. the total period of time (in minutes) during which there was a deviation;

i. the pressure drop readings immediately after the corrective action was implemented; and

j. the name(s) of the personnel who performed the work.

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0113348, issued on 03/08/2013: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0113348, issued on 03/08/2013: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

PE and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.08 pound per hour and 0.36 ton per year.

Applicable Compliance Method:

Emissions from the baghouse are determined by multiplying the maximum uncontrolled particulate emissions vented to the baghouse of 82.3 pounds per hour by the baghouse control efficiency of 99.9%.

82.3 pounds of PE/PM10 x (1-0.999) = 0.08 pound of PE/PM10 per hour.

The PE/PM10 limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-06105 submitted on March 4, 2009. If required, compliance with the PE/PM10 limit shall be demonstrated by emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual PE/PM10 limitation was developed by multiplying the hour PE/PM10 limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable compliance method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0113348, issued on 03/08/2013: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.