

**Final Action Recommendation on a Permit to Install**

Public Written comments are to be accepted at the Ohio EPA O/laa for a 30 day period only beginning with the date of the newspaper publication of the preliminary staff determination, or 50 days from the date the draft action was issued.

Mark as appropriate and insert date if warranted:

Date of Publication in Newspaper -**PUBLICATION DATE**  **Draft Date + 50 Days**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

**Comments Received** (Mark each row as appropriate with an 'X' and enter the appropriate information)

Add rows as applicable:

<input type="checkbox"/> No Comments Received	
<b>Enter Name of Commentor Here</b>	<b>Date Comment Received</b>

**Final Recommendation** (Mark one row as appropriate):

<input type="checkbox"/> Approval
<input type="checkbox"/> Approval with Changes (Make changes on electronic copy of issued permit )
<input type="checkbox"/> Denial - <b>Enter Reason for Denial Here</b>

**Reviewing Engineer:**

<b>Enter Name and Date Here</b>	<b>Enter Name and Date Here</b>
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**District Office Review** (Required for local air agencies only if final recommendation differs from the preliminary staff determination):

<b>Enter Name and Date Here</b>	<b>Enter Name and Date Here</b>
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**Central Office Review** (Required for local air agencies only if final recommendation differs from the preliminary staff determination):

<b>Enter Name and Date Here</b>	<b>Enter Name and Date Here</b>
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This form and the accompanying final version of the PTI must be forwarded to the [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us) within 30 days of the end of the comment period or receipt of record of a public meeting if one had been held.

State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
HAMILTON COUNTY  
Application No: 14-04063**

**CERTIFIED MAIL**

**DATE:** 3/22/2001

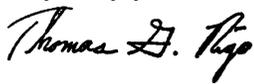
Procter and Gamble Company Food Plant  
Brian Bachman  
5201 Spring Grove Ave  
Saint Bernard, OH 452171025

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 500** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,



Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04063**

Application Number: 14-04063  
APS Premise Number: 1431392212  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Procter and Gamble Company Food Plant  
Person to Contact: Brian Bachman  
Address: 5201 Spring Grove Ave  
Saint Bernard, OH 452171025

Location of proposed air contaminant source(s) [emissions unit(s)]:

**5204 Spring Grove Ave  
Saint Bernard, Ohio**

Description of proposed emissions unit(s):

**Oleochemical manufacturing process and associated natural gas fired boilers and storage tanks - modification of PTI 14-4063 as issued on 6/5/96.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**Procter and Gamble Company Food Plant**  
**PTI Application: 14-04063**  
**Issued: To be entered upon final issuance**  
**Part I - GENERAL TERMS AND CONDITIONS**

**Facility ID: 1431392212**

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. 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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or Record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, 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

**Procter and Gamble Company Food Plant**

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measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, Record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. 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 are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

## **4. 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.

**Procter and Gamble Company Food Plant****Facility ID: 1431392212****PTI Application: 14-04063****Issued: To be entered upon final issuance**

Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

**5. 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.

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. 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.

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section

**Procter and Gamble Company Food Plant****Facility ID: 1431392212****PTI Application: 14-04063****Issued: To be entered upon final issuance**

3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

**8. 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.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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:
  - i. 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.
  - ii. 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 ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. 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 appropriate Ohio EPA District Office or local air 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

**Procter and Gamble Company Food Plant**

**Facility ID: 1431392212**

**PTI Application: 14-04063**

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reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. 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.

#### **10. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**Procter and Gamble Company Food Plant**

**Facility ID: 1431392212**

**PTI Application: 14-04063**

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Record keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or Record keeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. 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.

**5. Termination of Permit To Install**

**Procter and Gamble Company Food Plant**

**Facility ID: 1431392212**

**PTI Application: 14-04063**

**Issued: To be entered upon final issuance**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

## **6. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

## **7. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## **8. Applicability**

**Procter and Gamble Company Food Plant**  
**PTI Application: 14-04063**  
**Issued: To be entered upon final issuance**

**Facility ID: 1431392212**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**9. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	7.86
PM <sub>10</sub>	7.86
SO <sub>2</sub>	0.092
NO <sub>x</sub>	15.33
CO	16.86
OC	12.29

**Procter and Gamble Company Food Plant**  
**PTI Application: 14-04063**  
**Issued: To be entered upon final issuance**

**Facility ID: 1431392212**

**Procte**

**PTI A**

Emissions Unit ID: B008

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

Procte

PTI A

Emissions Unit ID: B008

**Issued: To be entered upon final issuance****Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

40 CFR 60 Subpart Dc

B008 - 35 MMBTU/hr natural gas-fired boiler (modification)	OAC rule 3745-31-05(A)(3)
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OAC rule 3745-17-07(A)(1)

OAC rule 3745-17-10(B)(1)

**Procte**

**PTI A**

Emissions Unit ID: B008

**Issued: To be entered upon final issuance**

Applicable Emissions

Limitations/Control

Measures

PM-PM<sub>10</sub>\*: 0.0019  
lb/MMBtu, 0.29 TPY

SO<sub>2</sub>: 0.021 lb/hr, 0.092 TPY

NO<sub>x</sub>: 3.50 lbs/hr, 15.33 TPY

CO: 3.85 lbs/hr, 16.86 TPY

OC: 0.23 lb/hr, 1.01 TPY

\*Assume all PM emissions  
are PM<sub>10</sub> emissions.

The requirements for this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 40 CFR 60 Subpart Dc.

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

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

See term A.III.1.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas, a low NO<sub>x</sub> burner, and compliance with 40 CFR 60 Subpart Dc.
- 2.b** The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.
- 2.c** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

- 1.** The permittee shall maintain daily records of the quantity of natural gas burned in this emissions unit.

**IV. Reporting Requirements**

- 1.** Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. Actual start-up date (within 15 days after such date); and
  - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit

**Procte**

**PTI A**

Emissions Unit ID: B008

**Issued: To be entered upon final issuance**

P. O. Box 163669  
Columbus, Ohio 43216-3669

and

Department of Environmental Services  
250 William Howard Taft Road  
Cincinnati, Ohio 45219

**V. Testing Requirements**

1. Compliance with the emissions limits in Term A.1 shall be demonstrated by the emissions factors in AP-42, Table 1.4-2 revised 7/98, as well as emission factors provided by the facility.
2. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B008 - 35 MMBTU/hr natural gas-fired boiler	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004-Oleochemical manufacturing process (modification)	OAC rule 3745-31-05(A)(3)	OC: 2.57 lbs/hr, 11.26 TPY

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a scrubber for control of OC and compliance with the allowable emission rates.
- 2.b The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**II. Operational Restrictions**

1. The pressure drop across the scrubber shall be continuously maintained in a range of 0.0-0.7 inches of water at all times while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 9.4 gallons per minute at all times while the emissions unit is in operation.

**III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly production records for this emissions unit.

**Issued: To be entered upon final issuance**

2. The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop across the scrubber and the scrubber flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
  
3. The permittee shall collect and record the following information daily:
  - a. The pressure drop across the scrubber, in inches of water, on an daily basis.
  - b. The scrubber water flow rate, in gallons per minute, on an daily basis.
  - c. The operating times for the capture system, control device, monitoring equipment, and the associated emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber flow rate.
  
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.

**VI. Miscellaneous Requirements**

None

Procte

PTI A

Emissions Unit ID: P004

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - Oleochemical manufacturing process modification	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - Solids handling-Additive 1	OAC rule 3745-31-05(A)(3)	PM-PM <sub>10</sub> *: 5.6 lbs/hr, 5.11 TPY  *Assume all PM emissions are PM <sub>10</sub> emissions.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a bag-house and compliance with the allowable emission rates.
- 2.b The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

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this limit.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 0-7 inches of water while the emissions unit is in operation.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for throughput.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.
2. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

None

**Procte  
PTI A**

Emissions Unit ID: P006

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - Solids handling-Additive 1	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P007 - Solids handling-Additive 2	OAC rule 3745-31-05(A)(3)	PM-PM <sub>10</sub> *: 0.14 lb/hr, 0.59 TPY  *Assume all PM emissions are PM <sub>10</sub> emissions.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).  Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a bag-house and compliance with the allowable emission rates.
- 2.b The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

**Issued: To be entered upon final issuance**  
this limit.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 0-7 inches of water while the emissions unit is in operation.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for throughput for this emissions unit.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.
2. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

None

Procte

PTI A

Emissions Unit ID: P007

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P007 - Solids handling- Additive 2	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P008 - Solids handling-Additive 3	OAC rule 3745-31-05(A)(3)	PM-PM <sub>10</sub> *: 1.06 lbs/hr, 1.30 TPY  *Assume all PM emissions are PM <sub>10</sub> emissions.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).  Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a bag-house and compliance with the allowable emission rates.
- 2.b The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

**Issued: To be entered upon final issuance**  
this limit.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 0-7 inches of water while the emissions unit is in operation.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for throughput for this emissions unit.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.
2. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

None

Procte

PTI A

Emissions Unit ID: P008

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P008 - Solids handling-Additive 3	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P009 - Solids handling-Additive 4	OAC rule 3745-31-05(A)(3)	PM-PM <sub>10</sub> *: 2.39 lbs/hr, 0.22 TPY  *Assume all PM emissions are PM <sub>10</sub> emissions.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a bag-house and compliance with the allowable emission rates.
- 2.b The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

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this limit.

**II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 0-7 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for throughput for this emissions unit.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.
2. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

**VI. Miscellaneous Requirements**

None

**Procte  
PTI A**

Emissions Unit ID: P009

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P009 - Solids handling-Additive 4	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P010 - Solids handling-Additive 5	OAC rule 3745-31-05(A)(3)	PM-PM <sub>10</sub> *: 1.44 lbs/hr, 0.13 TPY  *Assume all PM emissions are PM <sub>10</sub> emissions.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a bag-house and compliance with the allowable emission rates.
- 2.b The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

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this limit.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 0-7 inches of water while the emissions unit is in operation.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for throughput for this emissions unit.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.
2. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

None

Procte

PTI A

Emissions Unit ID: P010

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P010 - Solids handling-Additive 5	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 - Mill #1	OAC rule 3745-31-05(A)(3)	PM-PM <sub>10</sub> *: 0.051 lb/hr, 0.22 TPY  *Assume all PM emissions are PM <sub>10</sub> emissions.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).  Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a bag-house and compliance with the allowable emission rates.
- 2.b The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance

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with these limits.

**II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 0-7 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for throughput for this emissions unit.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.
2. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

**VI. Miscellaneous Requirements**

None

Procte

PTI A

Emissions Unit ID: P011

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 - Mill #1	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T024 - 137,000 gallon fixed roof storage tank-S-2505	OAC rule 3745-31-05(A)(3)	0.0035 TPY OC  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.
	OAC rule 3745-21-07(D)	Exempt
	40 CFR 60 Subpart Kb	See terms A.I.2.c. and A.III.1.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill and compliance with 40 CFR 60 Subpart Kb.
- 2.b The annual emission limitation outlined is based upon the emission unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with these limits.
- 2.c The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

**II. Operational Restrictions**

Issued: To be entered upon final issuance

None

**III. Monitoring and/or Record keeping Requirements**

- 1. In accordance with 40 CFR Part 60.116b(a) and (b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the storage vessel.

**IV. Reporting Requirements**

- 1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. Actual start-up date (within 15 days after such date); and
  - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
 DAPC - Permit Management Unit  
 P.O. Box 163669  
 Columbus, Ohio 43216-3669

and

Hamilton County Dept. of Environmental Services  
 250 William Howard Taft Road  
 Cincinnati, Ohio 45219

**V. Testing Requirements**

**Procte**

**PTI A**

Emissions Unit ID: T024

**Issued: To be entered upon final issuance**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T024 - 137,000 gallon fixed roof storage tank-S-2505	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T025 - 137,000 gallon fixed roof storage tank-S-2511	OAC rule 3745-31-05(A)(3)	0.0035 TPY OC  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.
	OAC rule 3745-21-07(D)	Exempt
	40 CFR 60 Subpart Kb	See terms A.I.2.c. and A.III.1.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill and compliance with 40 CFR 60 Subpart Kb.
- 2.b The annual emission limitation outlined is based upon the emission unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with these limits.
- 2.c The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

**II. Operational Restrictions**

Issued: To be entered upon final issuance

None

**III. Monitoring and/or Record keeping Requirements**

- 1. In accordance with 40 CFR Part 60.116b(a) and (b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the storage vessel.

**IV. Reporting Requirements**

- 1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. Actual start-up date (within 15 days after such date); and
  - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
 DAPC - Permit Management Unit  
 P.O. Box 163669  
 Columbus, Ohio 43216-3669

and

Hamilton County Dept. of Environmental Services  
 250 William Howard Taft Road  
 Cincinnati, Ohio 45219

**V. Testing Requirements**

**Procte**

**PTI A**

Emissions Unit ID: T025

**Issued: To be entered upon final issuance**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T025 - 137,000 gallon fixed roof storage tank-S-2511	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T028 - 30,000 gallon fixed roof storage tank-S-5501	OAC rule 3745-31-05(A)(3)	0.017 TPY OC  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.
	OAC rule 3745-21-07(D)	Exempt
	40 CFR 60 Subpart Kb	See terms A.I.2.c. and A.III.1.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill and compliance with 40 CFR 60 Subpart Kb.
- 2.b The annual emission limitation outlined is based upon the emission unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with these limits.
- 2.c The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

**II. Operational Restrictions**

**Issued: To be entered upon final issuance**

None

**III. Monitoring and/or Record keeping Requirements**

1. In accordance with 40 CFR Part 60.116b(a) and (b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the storage vessel.

**IV. Reporting Requirements**

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. Actual start-up date (within 15 days after such date); and
  - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P.O. Box 163669  
Columbus, Ohio 43216-3669

and

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Road  
Cincinnati, Ohio 45219

**V. Testing Requirements**

**Procte**

**PTI A**

Emissions Unit ID: T028

**Issued: To be entered upon final issuance**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI-14-04063.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T028 - 30,000 gallon fixed roof storage tank-S-5501	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None