



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

12/29/2015

Mr. Nasser Bekheet  
 CL Products International, LLC  
 250 Eastern Ave  
 Leesburg, OH 45135

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0536000020  
 Permit Number: P0119366  
 Permit Type: Renewal  
 County: Highland

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

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

If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
CL Products International, LLC**

Facility ID:	0536000020
Permit Number:	P0119366
Permit Type:	Renewal
Issued:	12/29/2015
Effective:	12/29/2015
Expiration:	12/29/2020





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
CL Products International, LLC

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**Final Permit-to-Install and Operate**  
CL Products International, LLC  
**Permit Number:** P0119366  
**Facility ID:** 0536000020  
**Effective Date:** 12/29/2015

## Authorization

Facility ID: 0536000020  
Application Number(s): A0053964  
Permit Number: P0119366  
Permit Description: FEPTIO renewal permit for candle manufacturing facility.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 12/29/2015  
Effective Date: 12/29/2015  
Expiration Date: 12/29/2020  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CL Products International, LLC  
EASTERN AVENUE  
Leesburg, OH 45135

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

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

Ohio EPA DAPC, Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402  
(937)285-6357

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0119366  
 Permit Description: FEPTIO renewal permit for candle manufacturing facility.

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

**Emissions Unit ID: P011**  
 Company Equipment ID: Prill Drum 15 (Test Drum)  
 Superseded Permit Number: P0106625  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P014**  
 Company Equipment ID: Prill Drum 1  
 Superseded Permit Number: P0106625  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P030**  
 Company Equipment ID: Fill Line 1  
 Superseded Permit Number: P0119145  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P036**  
 Company Equipment ID: Fill Line 5A  
 Superseded Permit Number: P0119145  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P039**  
 Company Equipment ID: Cleanup  
 Superseded Permit Number: P0107195  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P040**  
 Company Equipment ID: Fill Line 8  
 Superseded Permit Number: P0119145  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P041**  
 Company Equipment ID: Fill Line 9  
 Superseded Permit Number: P0119145  
 General Permit Category and Type: Not Applicable

**Group Name: 2,600 lb\hr Fill lines**

<b>Emissions Unit ID:</b>	<b>P034</b>
Company Equipment ID:	Fill Line 4
Superseded Permit Number:	P0119145
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P035</b>
Company Equipment ID:	Fill line 5
Superseded Permit Number:	P0119145
General Permit Category and Type:	Not Applicable



**Group Name: 4,200 lb/hr fill line P031 P032**

<b>Emissions Unit ID:</b>	<b>P031</b>
Company Equipment ID:	Fill Line 7
Superseded Permit Number:	P0119145
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P032</b>
Company Equipment ID:	Fill line 6
Superseded Permit Number:	P0119145
General Permit Category andType:	Not Applicable

**Group Name: Prill Drums w/40lb/dayeach**

<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	Prill Drum 3
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	Prill Drum 4
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	Prill Drum 5
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	Prill Drum 6
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	Prill Drum 7
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P021</b>
Company Equipment ID:	Prill Drum 8
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P022</b>
Company Equipment ID:	Prill Drum 9
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P023</b>
Company Equipment ID:	Prill Drum 10
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P024</b>
Company Equipment ID:	Prill Drum 11
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P025</b>
Company Equipment ID:	Prill Drum 12
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P026</b>
Company Equipment ID:	Prill Drum 13
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P027</b>
Company Equipment ID:	Prill Drum 14
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable

**Group Name: Prilling Towers**

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Prill Tower 4
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Prill Tower 1
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Prill Tower 2
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Prill Tower 3
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	Prill Tower 5
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	Prill Tower 6
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	Prill Tower 7
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P028</b>
Company Equipment ID:	Prill Tower 8
Superseded Permit Number:	P0106625
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
CL Products International, LLC  
**Permit Number:** P0119366  
**Facility ID:** 0536000020  
**Effective Date:** 12/29/2015

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
CL Products International, LLC  
**Permit Number:** P0119366  
**Facility ID:** 0536000020  
**Effective Date:** 12/29/2015

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2 thru B.4.
2. The actual volatile organic compound (VOC) emissions from emissions units P003-P008, P010, P011, P014, P016-P028, P030, P031, P032, P034, P035, P036, and P039-P041, including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed shall not exceed 70.0 tons per year (TPY), based upon rolling, 12-month summations.
3. The permittee shall collect and record the following information each month for the collective VOC emissions from emissions units P003-P008, P010, P011, P014, P016-P028, P030, P031, P032, P034, P035, P036, and P039-P041, including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit :
  - a) The amount of VOC/OC emitted per emissions unit, in tons per month;
  - b) The total amount of VOC/OC emitted facility-wide during the month, in tons, (the summation of "a)" for all emissions units at the facility); and
  - c) The total amount of VOC/OC emitted facility-wide, in the previous rolling 12-month period, (the summation of "b)" and the combined total "b)" for the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a) all instances volatile organic compound (VOC) emissions from P003-P008, P010, P011, P014, P016-P028, P030, P031, P032, P034, P035, P036, and P039-P041, including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit exceeds 70.0 tons per year (TPY), based upon rolling, 12-month summations.

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



**Final Permit-to-Install and Operate**  
CL Products International, LLC  
**Permit Number:** P0119366  
**Facility ID:** 0536000020  
**Effective Date:** 12/29/2015

## **C. Emissions Unit Terms and Conditions**

**1. P011, Prill Drum 15 (Test Drum)**

**Operations, Property and/or Equipment Description:**

Prill Drum 15

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., below.
- 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)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.15 pound per hour and 0.66 tons per year.</p> <p>Particulate emissions (PE) shall not exceed 0.03 pound per hour and 0.131 ton per year.</p> <p>Visible emissions from the stack shall not exceed 5% opacity, as a six minute average.</p> <p>See b)(2)b. below.</p>
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	<p>The VOC emissions from the permitted emissions units at this facility shall not exceed 70.0 tons per rolling, 12-month period.</p> <p>The emission limitation, recordkeeping</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and reporting requirements are specified in the Facility-wide limitations, in section B., above.
c.	OAC rule 3745-17-11(B)(3)	Exempt.  See b)(2)a., below.

(2) Additional Terms and Conditions

- a. This facility is located in Highland County which particulate emissions (PE) is regulated under OAC rule 3745-17-11(B)(3). Under this rule the “Maximum Allowable Mass Rate of Emission of Particulate Matter” is determined by the use of “Figure II” and curve P-3. However, since the uncontrolled mass rate of PE of less than ten pounds per hour, under OAC rule 3745-17-11(A)(2), "Figure II" shall not apply to this emissions unit.

Please note the Prill towers, emissions units P003-P008, P010, and P028 are equipped with a capture system that recovers product and recycles it back through the process. Since this system is for product recovery it is not a control device, rather an intrigue part of the emissions unit.

- b. The hourly emission limitation specified above represents the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.

c) Operational Restrictions

- (1) Fragrance containers shall be kept closed when not in use to prevent fragrance from escaping.
- (2) Batching tanks shall be equipped with lids and kept covered in such a way as to minimize the discharge of fugitive emissions to the atmosphere.
- (3) During normal operations, the prill tower room exit doors shall be kept closed to minimize the discharge of fugitive emissions to the atmosphere.
- (4) The fragrance concentration shall not exceed 10 percent by weight (of wax mix) for this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following information for this emissions unit:
  - a. the fragrance concentration in percent by weight of wax mix for each batch.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the fragrance concentration exceeds 10%, by weight; and
    - ii. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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:

70.0 tons of VOC/OC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. Emission Limitation:

0.15 pounds per hour of VOC/OC

The above potential emission limitations are based on the following equations:

$$Er = (P * EF)$$

Where:

ER= emission rate, in pounds of VOC/OC per month;

P= amount of materials processed, in pounds, (300 pounds per hour);

EF = hourly emission factor for Prill Source i, pounds emitted per pounds material processed, calculated as follows:

$$EF = (-0.00000051 \times (Fi)^2) + (0.00005554 \times Fi) + 0.0000015$$

Where Fi = the fragrance concentration, in percentage by weight, (10%).

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

c. Emission Limitation:

0.03 pounds per hour of PE/PM10

The above potential emission limitations are based on the following equations:

$$HER = P \times 0.0001$$



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Where:

HER= emission rate, in pounds of PE/PM10 per hour; and

P= total amount of materials processed, in pounds, (300 pounds per hour).

Applicable Compliance Method:

Compliance is based on the maximum potential usage. Prior to future modifications that would cause a potential increase in hourly PE/PM10 emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

g) Miscellaneous Requirements

(1) None.

**2. P014, Prill Drum 1**

**Operations, Property and/or Equipment Description:**

Prill Drum 1

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., below.
- 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)	The annual emissions from this emissions unit shall not exceed 5.3 tons of volatile organic compound (VOC) and 1.1 tons of particulate emissions (PE).
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in section B., above.
c.	OAC rule 3745-17-11(B)(3)	Exempt  See b)(2)a., below.

(2) Additional Terms and Conditions

- a. This facility is located in Highland County which particulate emissions (PE) is regulated under OAC rule 3745-17-11(B)(3). Under this rule the "Maximum Allowable Mass Rate of Emission of Particulate Matter" is determined by the use of "Figure II" and curve P-3. However, since the uncontrolled mass rate of PE of less than ten pounds per hour, under OAC rule 3745-17-11(A)(2), "Figure II" shall not apply to this emissions unit.
- b. The hourly emission limitation specified above represents the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.

c) Operational Restrictions

- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been

established and approved by the Director (the appropriate District Office or local air agency).

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

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3., "Facility-wide Terms and Conditions".

- b. Emission Limitation:

5.3 tons per year of VOC/OC

The above potential emission limitations are based on the following equations:

$$Er = (P \times EF) \times \left(\frac{8760}{2000}\right)$$

Where:



ER= emission rate, in tons of VOC per year;

P= total amount of materials processed, in pounds, (2,400 pounds per hour); and

EF = Emission factor for Prill Source, pounds emitted per pounds material processed, calculated as follows:

$$EF = (-0.00000051 \times (Fi)^2) + (0.00005554 \times Fi) + 0.0000015$$

Where Fi = the fragrance concentration, in percent by weight, (10%).

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

c. Emission Limitation:

1.05 tons per year of PE/PM10

The above potential emission limitations are based on the following equations:

$$AER = (P \times 0.0001) \times \left(\frac{8760}{2000}\right)$$

Where:

AER = emission rate, in tons of PE/PM10 per year; and

P = total amount of materials processed, in pounds, (2,400 pounds per hour).

Applicable Compliance Method:

Compliance is based on the maximum potential usage. Prior to future modifications that would cause a potential increase in hourly PE/PM10 emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

g) Miscellaneous Requirements

- (1) None.

**3. P030, Fill Line 1**

**Operations, Property and/or Equipment Description:**

Candle filling line 1

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)b., b)(1)d., and d(2), below.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c., below.
- 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) June 30, 2008	The volatile organic compounds (VOC) emissions shall not exceed 0.825 ton per month averaged over a twelve-month rolling period.  See b)(2)b., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-311-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year.  See b)(2)c., below.
c.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
d.	OAC rule 3745-114-01	Ohio Toxic Rule  See d)(2), below.

(2) Additional Terms and Conditions

- a. Best available technology (BAT) for this emissions unit has been determined to be the VOC emissions from this emissions unit shall not exceed 0.825 ton per month averaged over a twelve-month rolling period. The VOC emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the specific annual emission limitation.
- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the 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 FEPTIO 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 FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. Emission Limitation:

0.825 tons per year of VOC/OC

The above potential emission limitations are based on the following equations:

$$HER = (P \times EF) + (Iu \times Vc)$$

$$MER = [(HER) \times (8760/2000)]/12$$

Where:

HER= emission rate, in pounds per hour, (2.26);

Monthly average Emissions Rate, in tons per 12 month period;

P= total amount of materials processed, in pounds, (2,850 pounds per hour);

EF = Emission factor for Source, pounds emitted per pounds material processed, calculated as follows:

$$EF = [(-0.0003055 \times (F)^2) + (0.0439 \times (F)) + 0.0011] / 1000$$

$$EF = [(-0.0003055 \times (20)^2) + (0.0439 \times (20)) + 0.0011] / 1000$$

Where Fi = the fragrance concentration, in percent by weight, (20%).

$$EF = 0.0007569$$

Iu = Ink/makeup solvent usage, in gallons per hour, (0.015); and

Vc = VOC content of inks/Makeup materials employed, 6.76 pounds of VOC per gallon.



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**Facility ID:** 0536000020  
**Effective Date:** 12/29/2015

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

- g) Miscellaneous Requirements
  - (1) None.

**4. P036, Fill Line 5A**

**Operations, Property and/or Equipment Description:**

Candle filling line 5a

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)c. and d(2), below.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., below.
- 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) and ORC 3704.03(T) as effective 06/30/08	Volatile organic compounds (VOC) shall not exceed 0.842 ton per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
c.	OAC rule 3745-114-01	Ohio Toxic Rule  See d)(2), below.

- (2) Additional Terms and Conditions
- a. Best available technology (BAT) for this emissions unit has been determined to be the VOC emissions from this emissions unit shall not exceed 0.842 ton per month averaged over a twelve-month rolling period. The VOC emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the specific annual emission limitation.
- c) Operational Restrictions
- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the 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 FEPTIO 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 FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. Emission Limitation:

0.842 ton per month averaged over a twelve-month rolling period

The above potential emission limitations are based on the following equations:

$$HER = (P \times EF) + (Iu \times Vc)$$

$$MER = [(HER) \times (8760/2000)]/12$$

Where:

HER= emission rate, in pounds per hour, (2.30);

MER = Monthly average Emissions Rate, in tons per 12 month period;

P= total amount of materials processed, in pounds, (2,875 pounds per hour);

EF = Emission factor for Source, pounds emitted per pounds material processed, calculated as follows:

$$EF = [(-0.0003055 \times (F)^2) + (0.0439 \times (F)) + 0.0011] / 1000$$

$$EF = [(-0.0003055 \times (20)^2) + (0.0439 \times (20)) + 0.0011] / 1000$$

Where Fi = the fragrance concentration, in percent by weight, (20%).

$$EF = 0.0007569$$

Iu = Ink/makeup solvent usage, in gallons per hour, (0.015); and

Vc = VOC content of inks/Makeup materials employed, 6.76 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

g) Miscellaneous Requirements

(1) None.

**5. P039, Cleanup**

**Operations, Property and/or Equipment Description:**

Solvent Application for Wax Cleaning Operations

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)(c), d)(2) thru (5), and e)(2), below.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., below.
- 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) and ORC 3704.03(T) as effective 06/30/08	Volatile Organic Compounds (VOC) shall not exceed 2.35 ton per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
c.	OAC rule 3745-114-01	Ohio Toxic Rule  See d)(2) thru (5), and e)(2), below.

- (2) Additional Terms and Conditions
  - a. None.
- c) Operational Restrictions
  - (1) The permittee shall employ best practices to reduce VOC emissions from solvent cleaning operations. Such practices include storage of solvents in closed containers and storage of all liquid organic material laden rags in a closed container.
  - (2) Cleanup solvent employed in these operations shall have the following characteristics:
    - a. The cleaning solvent shall be a non-HAP containing material.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each month for the overall facility cleanup material emissions:
    - a. The company identification of each liquid organic material employed;
    - b. The VOC content (in pounds of VOC/gallon) of each cleanup material employed;
    - c. The number of gallons of each cleanup material employed;
    - d. The total VOC emissions, in tons [summation of (“(1)b.” x “(1)c.”)/ 2000 for all cleanup materials];
    - e. A record of each cleanup material employed in this emissions unit, indicating whether or not the cleanup material contains HAP-containing;
    - f. The total amount of VOC/OC emitted, in the previous rolling 12-month period, (the summation of “(1)d.” and the combined total “(1)d.” for the previous 11 months); and
    - g. The VOC ton per month averaged over a twelve-month rolling period, (the summation of (1)f. divided by 12).
  - (2) The FEPTIO application for this emissions unit, P039, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute” ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/\text{X} \times 5/\text{Y} = 4 \text{ TLV}/\text{XY} = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Stoddard Solvent (CAS # 8052-41-3)

TLV (mg/m<sup>3</sup>): 572 mg/m<sup>3</sup>

Maximum Emission Rate (g/sec): 0.81

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2685.23

MAGLC (ug/m<sup>3</sup>): 13,633

The permittee, has demonstrated that emissions of Stoddard Solvent (CAS # 8052-41-3), from emissions unit P039, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit, and
      - ii. all exceedances of 2.35 ton of Volatile Organic Compounds (VOC) per month averaged over a twelve-month rolling.
    - b. the probable cause of each deviation (excursion);
    - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
    - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
  - (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
  - (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio

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

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

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

- b. Emission Limitation:

2.35 ton of Volatile Organic Compounds (VOC) per month averaged over a twelve-month rolling period, from the use of cleanup material.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in d)(1), of this permit

g) Miscellaneous Requirements

- (1) None.



**6. P040, Fill Line 8**

**Operations, Property and/or Equipment Description:**

Fill Line 8, Candle production

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)c., and d(2), below.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., below.
- 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) and ORC 3704.03(T) as effective 06/30/08	Volatile organic compound (VOC) shall not exceed 1.06 ton per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
c.	OAC rule 3745-114-01	Ohio Toxic Rule  See d)(2), below.

- (2) Additional Terms and Conditions
- a. Best available technology (BAT) for this emissions unit has been determined to be the VOC emissions from this emissions unit shall not exceed 1.06 ton per month averaged over a twelve-month rolling period. The VOC emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the specific annual emission limitation.
- c) Operational Restrictions
- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the 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 FEPTIO 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 FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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:**

70.0 tons of VOC per rolling 12 month period, from the facility.

**Applicable Compliance Method:**

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. **Emission Limitation:**

1.06 ton per month averaged over a twelve-month rolling period of VOC/OC

The above potential emission limitations are based on the following equations:

$$HER = (P \times EF) + (Iu \times Vc)$$

$$MER = [(HER) \times (8760/2000)]/12$$

Where:

HER= emission rate, in pounds per hour, (2.90);

MER = Monthly average Emissions Rate, in tons per 12 month period;

P= total amount of materials processed, in pounds, (3,650 pounds per hour);

EF = Emission factor for Source, pounds emitted per pounds material processed, calculated as follows:

$$EF = [(-0.0003055 \times (F)^2) + (0.0439 \times (F)) + 0.0011] / 1000$$

$$EF = [(-0.0003055 \times (20)^2) + (0.0439 \times (20)) + 0.0011] / 1000$$

Where Fi = the fragrance concentration, in percent by weight, (20%).

$$EF = 0.0007569$$

Iu = Ink/makeup solvent usage, in gallons per hour, (0.015); and

Vc= VOC content of inks/Makeup materials employed, 6.76 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

g) Miscellaneous Requirements

(1) None.



**7. P041, Fill Line 9**

**Operations, Property and/or Equipment Description:**

Fill Line 9, Candle production

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)c. and d(2), below.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., below.
- 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) and ORC 3704.03(T) as effective 06/30/08	Volatile organic compound (VOC) shall not exceed 0.913 ton per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
c.	OAC rule 3745-114-01	Ohio Toxic Rule  See d)(2), below.

(2) Additional Terms and Conditions

- a. Best available technology (BAT) for this emissions unit has been determined to be the VOC emissions from this emissions unit shall not exceed 0.913 ton per month averaged over a twelve-month rolling period. The VOC emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the specific annual emission limitation.

c) Operational Restrictions

- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the 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 FEPTIO 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 FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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:**

70.0 tons of VOC per rolling 12 month period, from the facility.

**Applicable Compliance Method:**

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. **Emission Limitation:**

0.913 ton per month averaged over a twelve-month rolling period.

The above potential emission limitations are based on the following equations:

$$HER = (P \times EF) + (Iu \times Vc)$$

$$MER = [(HER) \times (8760/2000)]/12$$

Where:

HER= emission rate, in pounds per hour, (2.50);

MER = Monthly average Emissions Rate, in tons per 12 month period;

P = total amount of materials processed, in pounds, (3,150 pounds per hour);

EF = Emission factor for Source, pounds emitted per pounds material processed, calculated as follows:

$$EF = [(-0.0003055 \times (F)^2) + (0.0439 \times (F)) + 0.0011] / 1000$$

$$EF = [(-0.0003055 \times (20)^2) + (0.0439 \times (20)) + 0.0011] / 1000$$

Where Fi = the fragrance concentration, in percent by weight, (20%).

$$EF = 0.0007569$$

Iu = Ink/makeup solvent usage, in gallons per hour, (0.015); and

Vc = VOC content of inks/Makeup materials employed, 6.76 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

g) Miscellaneous Requirements

(1) None.



**8. Emissions Unit Group -2,600 lb\hr Fill lines: P034,P035,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P034	Candle filling line 4
P035	Candle filling line 5

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b, b)(1)d. and d(2), below.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., below.

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) as effective 06/30/08	<p>Volatile organic compound (VOC) shall not exceed 0.77 ton per month averaged over a twelve-month rolling period.</p> <p>See b)(2)b., below.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-311-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year.</p> <p>See b)(2)c., below.</p>
c.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
d.	OAC rule 3745-114-01	Ohio Toxic Rule  See d)(2), below.

(2) Additional Terms and Conditions

- a. Best available technology (BAT) for this emissions unit has been determined to be the VOC emissions from this emissions unit shall not exceed 0.77 ton per month averaged over a twelve-month rolling period. The VOC emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the specific annual emission limitation.
- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the 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 FEPTIO 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 FEPTIO.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. Emission Limitation:

0.77 ton of VOC/OC per month averaged over a twelve-month rolling period.

The above potential emission limitations are based on the following equations:

$$HER = (P \times EF) + (Iu \times Vc)$$

$$MER = [(HER) \times (8760/2000)]/12$$

Where:

HER= emission rate, in pounds per hour, (2.1);

MER = Monthly average Emissions Rate, in tons per 12 month period;

P= total amount of materials processed, in pounds, (2,600 pounds per hour);

EF = Emission factor for Source, pounds emitted per pounds material processed, calculated as follows:

$$EF = [(-0.0003055 \times (F)^2) + (0.0439 \times (F)) + 0.0011] / 1000$$

$$EF = [(-0.0003055 \times (20)^2) + (0.0439 \times (20)) + 0.0011] / 1000$$

Where Fi = the fragrance concentration, in percent by weight, (20%).

$$EF = 0.0007569$$

Iu = Ink/makeup solvent usage, in gallons per hour, (0.015); and

Vc = VOC content of inks/Makeup materials employed, 6.76 pounds of VOC per gallon.



**Final Permit-to-Install and Operate**  
CL Products International, LLC  
**Permit Number:** P0119366  
**Facility ID:** 0536000020  
**Effective Date:** 12/29/2015

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

- g) Miscellaneous Requirements
  - (1) None.

**9. Emissions Unit Group -Prill Drums:  
 P016,P017,P018,P019,P020,P021,P022,P023,P024,P025,P026,P027,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P016	Prill Drum 3
P017	Prill Drum 4
P018	Prill Drum 5
P019	Prill Drum 6
P020	Prill Drum 7
P021	Prill Drum 8
P022	Prill Drum 9
P023	Prill Drum 10
P024	Prill Drum 11
P025	Prill Drum 12
P026	Prill Drum 13
P027	Prill Drum 14

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	<p>Volatile organic compound (VOC) shall not exceed 0.775 ton per month averaged over a twelve-month rolling period.</p> <p>Particulate emissions (PE) shall not exceed 0.153 ton per month averaged</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		over a twelve-month rolling period. See b)(2)c., below.
b.	OAC paragraph 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)d., below.
c.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
d.	OAC rule 3745-17-11(B)(3)	Exempt  See b)(2)a., below.

(2) Additional Terms and Conditions

- a. This facility is located in Highland County which particulate emissions (PE) is regulated under OAC rule 3745-17-11(B)(3). Under this rule the “Maximum Allowable Mass Rate of Emission of Particulate Matter” is determined by the use of “Figure II” and curve P-3. However, since the uncontrolled mass rate of PE of less than ten pounds per hour, under OAC rule 3745-17-11(A)(2), "Figure II" shall not apply to this emissions unit.
- b. Best available technology (BAT) for this emissions unit has been determined to be the VOC emissions from this emissions unit shall not exceed 0.77 ton per month averaged over a twelve-month rolling period and the PE from this emissions unit shall not exceed 0.153 ton per month averaged over a twelve-month rolling period. The VOC and PE emission limitations reflect the potential to emit for this emissions unit; therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the specific annual emission limitation.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05, as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B.265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-311-05(A)(3) do not apply to the VOC and PE emissions from this air contaminant source since the potential to emit is less than 10 tons per year.

c) Operational Restrictions

- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required

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

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

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

- b. Emission Limitation:

0.775 ton of VOC/OC per month averaged over a twelve-month rolling period.

The above potential emission limitations are based on the following equations:

$$Er = \left[ (P \times EF) \times \left( \frac{8760}{2000} \right) \right] / 12$$

Where:

ER= emission rate, in tons of VOC per month averaged over a twelve-month rolling period;

P= total amount of materials processed, in pounds, (4,200 pounds per hour); and

EF = Emission factor for Prill Source, pounds emitted per pounds material processed, calculated as follows:



$$EF = (-0.00000051 \times (Fi)^2) + (0.00005554 \times Fi) + 0.0000015$$

Where Fi = the fragrance concentration, in percent by weight, (10%).

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

c. Emission Limitation:

0.153 ton of PE/PM10 per month averaged over a twelve-month rolling period

The above potential emission limitations are based on the following equations:

$$MER = \left[ (P \times 0.0001) \times \left( \frac{860}{2000} \right) \right] / 12$$

Where:

MER = Monthly average Emissions Rate, in tons per 12 month period; and

P= total amount of materials processed, in pounds, (4,200 pounds per hour.”

Applicable Compliance Method:

Compliance is based on the maximum potential usage. Prior to future modifications that would cause a potential increase in hourly PE/PM10 emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

Any changes in this emissions unit and/or the above equations that would cause an increase in the potential hourly emissions from this emissions unit will need to be reviewed by the appropriate office for possible additional air pollution permit requirements.

g) Miscellaneous Requirements

- (1) None.



**10. Emissions Unit Group -Prilling Towers: P003,P004,P005,P006,P007,P008,P010,P028,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P003	Prill Tower 4
P004	Prill Tower 1
P005	Prill Tower 2)
P006	Prill Tower 3
P007	Prill Tower 5
P008	Prill Tower 6
P010	Prill Tower 7
P028	Prill Tower 8

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. None.
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b., below.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 0.6 pound per hour and 2.63 tons per year.  Particulate emissions (PE) shall not exceed 0.3 pound per hour and 1.31 ton per year.  Visible emissions from the stack shall not exceed 5% opacity, as a six minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC emissions from the permitted emissions units at this facility shall not exceed 70.0 tons per rolling, 12-month period.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
c.	OAC rule 3745-17-11(B)(3)	Exempt  See b)(2)b., below.

(2) Additional Terms and Conditions

- a. This facility is located in Highland County which particulate emissions (PE) is regulated under OAC rule 3745-17-11(B)(3). Under this rule the “Maximum Allowable Mass Rate of Emission of Particulate Matter” is determined by the use of “Figure II” and curve P-3. However, since the uncontrolled mass rate of PE of less than ten pounds per hour, under OAC rule 3745-17-11(A)(2), "Figure II" shall not apply to this emissions unit.

Please note the Prill towers, emissions units P003-P008, P010, and P028 are equipped with a capture system that recovers product and recycles it back through the process. Since this system is for product recovery it is not a control device, rather an intrigue part of the emissions unit.

- b. The hourly emission limitation specified above represents the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.

c) Operational Restrictions

- (1) Fragrance containers shall be kept closed when not in use to prevent fragrance from escaping.
- (2) Batching tanks shall be equipped with lids and kept covered in such a way as to minimize the discharge of fugitive emissions to the atmosphere.
- (3) During normal operations, the prill tower room exit doors shall be kept closed to minimize the discharge of fugitive emissions to the atmosphere.
- (4) The fragrance concentration shall not exceed 10 percent by weight (of wax mix) for this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following information for this emissions unit:
- a. the fragrance concentration in percent by weight of wax mix for each batch.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the fragrance concentration exceeds 10%, by weight; and
    - ii. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. Emission Limitation:

0.6 pounds per hour of VOC/OC

The above potential emission limitations are based on the following equations:

$$Er = P \times EF$$

Where:

ER= emission rate, in tons of VOC per month;

P= total amount of materials processed, in pounds, (1,100 pounds per hour); and

EF = Emission factor for Prill Source, pounds emitted per pounds material processed, calculated as follows:

$$EF = (-0.00000051 \times (F)^2) + (0.00005554 \times F) + 0.0000015$$

Where Fi = the fragrance concentration, in percent by weight, (10%).

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.



- c. 0.3 pounds per hour of PE

The above potential emission limitations are based on the following equations:

$$HER = P \times 0.01 \times (1 - Re)$$

Where:

HER= emission rate, in pounds of PE/PM10 per hour;

P= total amount of materials processed, in pounds, (1,100 pounds per hour); and

Re= Material recovery system efficiency, in percent, (98%).”

Applicable Compliance Method:

Compliance is based on the maximum potential usage. Prior to future modifications that would cause a potential increase in hourly PE emissions, the permittee shall submit appropriate air pollution permit applications for review and processing.

- d. Emission Limitation:

5% opacity, as a 6-minute average, from the stack

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

- g) Miscellaneous Requirements

- (1) None.



**11. Emissions Unit Group -4,200 lb/hr fill line P031 P032**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P031	Candle filling line 7
P032	Candle filling line 6

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c. and d(2) below.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., below.

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	Volatile organic compound (VOC) shall not exceed 1.20 ton per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(D) (to avoid becoming a Title V facility)	The VOC facility-wide emissions from this facility shall not exceed 70 tons per year, based upon rolling, 12-month summations.  The emission limitation, recordkeeping and reporting requirements are specified in the Facility-wide limitations, in B., above.
c.	OAC rule 3745-114-01	Ohio Toxic Rule  See d)(2) below.

(2) Additional Terms and Conditions

- a. Best available technology (BAT) for this emissions unit has been determined to be the VOC emissions from this emissions unit shall not exceed 1.20 ton per month averaged over a twelve-month rolling period. The VOC emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the specific annual emission limitation.

c) Operational Restrictions

- (1) The permittee shall maintain this emissions unit in accordance with the manufacturer's specifications, maintenance guidance, and in accordance with the permit application in order to assure compliance with applicable air pollution rules and regulations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain all manufacturers' specifications and maintenance guidance, along with, records on maintenance and/or modifications performed on this emissions unit.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the 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 FEPTIO 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 FEPTIO.

e) Reporting Requirements

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- i. all exceedances of rolling, 12-month period facility wide VOC limitation of 70.0 tons as recorded in section B., of this permit.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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:

70.0 tons of VOC per rolling 12 month period, from the facility.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section B.3, "Facility-wide Terms and Conditions".

b. Emission Limitation:

1.20 ton of VOC/OC per month averaged over a twelve-month rolling period.

The above potential emission limitations are based on the following equations:

$$HER = (P \times EF) + (Iu \times Vc)$$



$$\text{MER} = [(\text{HER}) \times (8760/2000)]/12$$

Where:

HER = emission rate, in pounds per hour, (3.28);

MER = Monthly average Emissions Rate, in tons per 12 month period;

P = total amount of materials processed, in pounds, (4,200 pounds per hour);

EF = Emission factor for Source, pounds emitted per pounds material processed, calculated as follows:

$$\text{EF} = [(-0.0003055 \times (F)^2) + (0.0439 \times (F)) + 0.0011] / 1000$$

$$\text{EF} = [(-0.0003055 \times (20)^2) + (0.0439 \times (20)) + 0.0011] / 1000$$

Where  $F_i$  = the fragrance concentration, in percent by weight, (20%).

$$\text{EF} = 0.0007569$$

$I_u$  = Ink/makeup solvent usage, in gallons per hour, (0.015); and

$V_c$  = VOC content of inks/Makeup materials employed, 6.76 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance is based on the maximum potential usage and fragrance concentration. Prior to future modifications that would cause a potential increase in hourly VOC/OC emissions; the permittee shall submit appropriate air pollution permit applications for review and processing.

g) Miscellaneous Requirements

- (1) None.