Facility ID: 1677080001 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Go to Part II for Emissions Unit P907
Go to Part II for Emissions Unit P908

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Facility ID: 1677080001 Emissions Unit ID: P907 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Packaging dry detergent material, 1700 pounds per hour maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter (baghouse) common to P011, P012, P902, and P907.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A)	This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
	OAC rule 3745-17-11(B)	PE shall not exceed 3.68 pounds per hour (stack emissions). (based upon Table I, which is more stringent than Figure II, and a maximum process weight rate of 1700 pounds per hour)
	OAC rule 3745-31-05(A)(3)(b) (As proposed September 14, 2006) (PTI 16-02472 issued 12/7/06)	Employment of "best available technology" or "BAT", as defined by OAC rule 3745-31-01(T), is not a requirement since the emissions unit's potential to emit PE, taking into account the baghouse serving this emissions unit, is less than 10 tons per year.

2. **Additional Terms and Conditions**

   (a) The PE emissions limit of 3.68 pounds per hour specified by OAC rule 3745-17-11(B) is greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with this emission limit.

   However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed modification of equipment or production procedures, or any other change that would increase the potential emissions of any air pollutant.
   In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a baghouse (or comparable air pollution control device), associated air pollution control equipment (i.e., hoods, enclosures, ductwork, and fans, etc.), and any other equipment necessary to adequately enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
   Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the baghouse and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. **Operational Restrictions**

1. The permittee shall employ the baghouse serving this emissions unit at all times this emissions unit is in operation.

2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within 1 - 8 inches of water, while the emissions unit is in operation.

   Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall document when the baghouse serving this emissions unit was not in service when the emissions unit was in operation.

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

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:

   a. the color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;

   d. the total duration of the visible emissions incident; and

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

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:

   a. the color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;

   d. the total duration of the visible emissions incident; and

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

D. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these special terms and conditions shall be determined in accordance with the following methods:
   Emission Limitation: 20% opacity as a 6-minute average (stack emissions)

   Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).
   Emission Limitation: PE shall not exceed 3.68 pounds per hour (stack emissions).

   Applicable Compliance Method: If required, compliance shall be determined in accordance with the

requirements in 40 CFR Part 60, Appendix A, Method 5 and the methods and procedures specified in OAC rule 3745-17-03(B)(10).

F. **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] 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. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1677080001 Emissions Unit ID: P908 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Packaging dry detergent material, 6000 pounds per hour maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter (baghouse).	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A)	This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
	OAC rule 3745-17-11(B)	PE shall not exceed 8.56 pounds per hour (stack emissions). (based upon Table I, which is more stringent than Figure II, and a maximum process weight rate of 6000 pounds per hour)
	OAC rule 3745-31-05(A)(3)(b) (As proposed September 14, 2006) (PTI 16-02472 issued 12/7/06)	Employment of "best available technology" or "BAT", as defined by OAC rule 3745-31-01(T), is not a requirement since the emissions unit's potential to emit PE, taking into account the baghouse serving this emissions unit, is less than 10 tons per year.

2. **Additional Terms and Conditions**

   (a) The PE emissions limit of 8.56 pounds per hour specified by OAC rule 3745-17-11(B) is greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with this emission limit.

   However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed modification of equipment or production procedures, or any other change that would increase the potential emissions of any air pollutant.
   In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a baghouse (or comparable air pollution control device), associated air pollution control equipment (i.e., hoods, enclosures, ductwork, and fans, etc.), and any other equipment necessary to adequately enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit,

in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.

Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the baghouse and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. **Operational Restrictions**

1. The permittee shall employ the baghouse serving this emissions unit at all times this emissions unit is in operation.

2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within 1 - 17 inches of water, while the emissions unit is in operation.

   Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall document when the baghouse serving this emissions unit was not in service when the emissions unit was in operation.

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

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:

   a. the color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;

   d. the total duration of the visible emissions incident; and

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

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:

   a. the color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;

   d. the total duration of the visible emissions incident; and

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

D. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these special terms and conditions shall be determined in accordance with the following methods:

Emission Limitation: 20% opacity as a 6-minute average (stack emissions)

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).
Emission Limitation: PE shall not exceed 8.56 pounds per hour (stack emissions).

Applicable Compliance Method: If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 and the methods and procedures specified in OAC rule 3745-17-03(B)(10).

F. **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] 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. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.