



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 14-05026

DATE: 5/17/2001

Procter & Gamble Co
Brian Bachman
5201 Spring Grove Ave
Cincinnati, OH 45217

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

HCDES



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 14-05026

Application Number: 14-05026
APS Premise Number: 1431390903
Permit Fee: **\$400**
Name of Facility: Procter & Gamble Co
Person to Contact: Brian Bachman
Address: 5201 Spring Grove Ave
Cincinnati, OH 45217

Location of proposed air contaminant source(s) [emissions unit(s)]:
5201 Spring Grove Ave
Cincinnati, Ohio

Description of proposed emissions unit(s):
245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

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

11. Best Available Technology

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

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Air Pollution Nuisance

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

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

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

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

7. Public Disclosure

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

8. Applicability

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

emissions unit(s).

9. Construction Compliance Certification

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
SO2	54.24
NOx	114.82
CO	112.68
OC	5.37
PM/PM10	21.47
Pb	0.0015

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

OAC rule 3745-17-10(B)(1)	Applicable Emissions <u>Limitations/Control Measures</u>	include compliance with the requirements of 40 CFR Part 60 Subpart Db, OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-05(D).
OAC rule 3745-18-06(D)	0.50 lb SO ₂ /MMBtu (when burning oil)	3745-31-05(D).
	0.0006 lb SO ₂ /MMBtu (when burning gas)	54.24 TPY SO ₂ *
	0.10 lb NO _x /MMBtu (when burning gas at a rate of 61.25 MMBtu/hr or higher)**	See term A.VI.2.
	0.17 lb NO _x /MMBtu (when burning oil at a rate of 61.25 MMBtu/hr or higher)**	See term A.VI.2.
	0.20 lb NO _x /MMBtu (when burning gas or oil at a rate of less than or equal to 61.25 MMBtu/hr)**	See term A.I.2.c. for the opacity standard. See terms A.II.2., A.III.3. and A. IV.4. for the SO ₂ standards.
	114.82 TPY NO _x *	
	0.105 lb CO/MMBtu (when burning gas or oil at a rate of 61.25 MMBtu/hr or higher)	The emission limitation specified by this rule for NO _x is less stringent than the NO _x emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	6.50 lbs CO/hr (when burning gas or oil at a rate of less than or equal to 61.25 MMBtu/hr)	
	112.68 TPY CO*	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart Db.
	0.005 lb OC/MMBtu and 5.37 TPY OC*	
	0.020 lb PM ₁₀ /MMBtu	0.020 lb PM/MMBtu of actual heat input.
	21.47 TPY PM/PM ₁₀ *	
	9E-6 lb Pb/MMBtu (when burning oil)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	5E-7 lb Pb/MMBtu (when burning gas)	
	0.0015 TPY Pb*(Lead)	
	The requirements of this rule also	

*Based on a rolling, 365-day summation of the daily emissions.

** Compliance with the NOx emission limitations stated above shall be based on a daily average recorded by the NOx monitoring system during each day that the emissions unit was in operation. A separate average shall be calculated for each of the 3 firing scenarios outlined above. A new daily average emission rate is calculated each day that the emissions unit is in operation.

2. Additional Terms and Conditions

- 2.a** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the limited hours of operation when burning No. 2 fuel oil, emissions limitations, and the use of low NOx burners.
- 2.c** In accordance with 40 CFR 60.43b(f), visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except for one six-minute period per hour of not more than 27 percent opacity.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.
2. The quality of the No. 2 oil burned in this emissions unit shall have a combination of sulfur

content and heat content sufficient to meet the sulfur dioxide emission limitation of 0.50 lb/MMBtu of actual heat input.

3. The maximum annual hours of operation when burning No. 2 fuel oil in this emissions unit shall not exceed 876 hours, based upon a rolling, 365-day summation of the hours of operation when burning No. 2 fuel oil.

Issued: 5/17/2001

To ensure enforceability during the first 12 calendar months of operation following the startup of this emissions unit , the permittee shall not exceed the hours of operation when burning No. 2 fuel oil limits specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative Hours of Operation When Burning No. 2 Fuel Oil</u>
1	500
1-2	500
1-3	500
1-4	500
1-5	500
1-6	500
1-7	700
1-8	700
1-9	700
1-10	876
1-11	876
1-12	876

After the first 12 calendar months of operation following start-up of this emissions unit , compliance with the annual hours of operation when burning No. 2 fuel oil limitation shall be based upon a rolling, 365-day summation of the hours of operation when burning No. 2 fuel oil.

4. The permittee shall install, operate and maintain low-NOx burners at all times when operating this emissions unit.
5. The start up of emissions unit B043, OEPA premise number 1431390903 shall be concurrent with

the complete and permanent shutdown of Ohio EPA emissions unit B021, OEPA premise number 1431390903.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. Prior to the installation of the continuous NO_x monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which this emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6.

The permittee shall operate and maintain existing equipment to continuously monitor and record NO_x from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 .

The permittee shall maintain records of all data obtained by the continuous NO_x monitoring system including, but not limited to, parts per million NO_x on an instantaneous (one-minute) basis, emissions of NO_x in units of the applicable standard in the appropriate averaging period (e.g., hourly, hourly rolling, 3-hour, daily, 30-day rolling, etc.), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur

Emissions Unit ID: B043

content, heat content and the calculated SO₂ emission rate [the SO₂ emission rate shall be calculated as specified in OAC 3745-18-04(F)]. The records shall also include certification from the fuel oil supplier that the oil meets the definition of distillate oil [see 40 CFR 60.49b(r)].

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

4. The permittee shall maintain daily records of the quantity of oil (in gallons) and natural gas (in mmft³) used in this emissions unit.
5. The permittee shall maintain daily records of the following information for this emissions unit:
 - a. The total hours of operation when burning No. 2 fuel oil for each day ; and,
 - b. Beginning after the first 12 calendar months of operation following the start-up of this emissions unit , the rolling, 365-day summation of the hours of operation when burning No. 2 fuel oil .

Also, during the first 12 calendar months of operation following the start-up of this emissions unit , the permittee shall record the cumulative hours of operation when burning No. 2 fuel oil for each calendar month .

6. For each day that this emissions unit burns No. 2 fuel oil, the permittee shall conduct, or have conducted, an one hour visible particulate emissions test in accordance with the following requirements:
 - a. The visible particulate emissions test shall be conducted to demonstrate compliance with the visible particulate limitation outlined in this permit;
 - b. The following test method(s) shall be employed to demonstrate compliance with the visible particulate limitation: Method 9 as outlined in 40 CFR Part 60, Appendix A; and
 - c. The visible particulate emissions test shall be conducted by a certified visible emissions evaluator who has met the specifications of Method 9 outlined in 40 CFR Part 60, Appendix A.

A comprehensive written report on the results of the visible particulate emissions test shall be

signed by the person or persons responsible for the test and retained for a period of five years from the date the record was created. This report shall contain the following information:

- a. A copy of the visible emissions evaluation form; and
 - b. A copy of the visible emissions evaluator certification.
7. For each day during which this emissions unit operates burning natural gas at a rate of 61.25 MMBtu/hr or higher, the permittee shall maintain daily records of the following information for this emissions unit, for the purpose of determining NO_x emissions:
- a. The NO_x emission rate, in lbs NO_x/MMBtu, as a daily average, when burning natural gas at a rate of 61.25 MMBtu/hr or higher; and
 - b. The heat input, in MMBtu/hour, as a daily average, when burning natural gas at a rate of 61.25 MMBtu/hr or higher.
8. For each day during which this emissions unit operates burning fuel oil at a rate of 61.25 MMBtu/hr or higher, the permittee shall maintain daily records of the following information for this emissions unit, for the purpose of determining NO_x emissions:
- a. The NO_x emission rate, in lbs NO_x/MMBtu, as a daily average, when burning fuel oil at a rate of 61.25 MMBtu/hr or higher; and
 - b. The heat input, in MMBtu/hour, as a daily average, when burning fuel oil at a rate of 61.25 MMBtu/hr or higher.
9. For each day during which this emissions unit operates burning natural gas or fuel oil at a rate of less than or equal to 61.25 MMBtu/hr, the permittee shall maintain daily records of the following information for this emissions unit, for the purpose of determining NO_x emissions:
- a. The NO_x emission rate, in lbs NO_x/MMBtu, as a daily average, when burning natural gas or fuel oil at a rate of less than or equal to 61.25 MMBtu/hr; and
 - b. The heat input, in MMBtu/hour, as a daily average, when burning natural gas or fuel oil at a rate of less than or equal to 61.25 MMBtu/hr.
10. The permittee shall maintain the following records:

Beginning after the first 12 calendar months of operation following the startup of this emissions unit, the rolling, 365-day summation of the NOx emissions, in tons per year. Also, during the first 12 calendar months of operation following the startup of this emissions unit, the permittee shall record the cumulative NOx emissions in pounds or tons for each calendar day.

11. The permittee shall maintain daily records of the CO emissions from this emissions unit.
12. The permittee shall maintain the following records:

Beginning after the first 12 calendar months of operation following the start-up of this emissions unit, the rolling, 365-day summation of the CO emissions, in tons per year. Also, during the first 12 calendar months of operation following the start-up of this emissions unit, the permittee shall record the cumulative CO emissions in pounds or tons for each calendar day.

IV. Reporting Requirements

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

Reports are to be sent to:

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

and

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

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and

40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO_x values in excess of the applicable limits specified in the terms and conditions of this permit. These reports shall also contain the total NO_x emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous NO_x monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
 - a. the total quantity of oil received in each shipment (gallons);
 - b. the weighted* average sulfur content (percent by weight) for the oil received during each calendar month;
 - c. the weighted* average heat content (Btu/gallon) of the oil received during each calendar month; and
 - d. the weighted* average SO₂ emission rate (lbs/MMBtu of actual heat input) of the oil

Emissions Unit ID: B043
 combusted during each calendar month [the
 SO₂ emission rate shall be calculated as
 specified in OAC 3745-18-04(F)].

*In proportion to the quantity of oil received in each shipment during each calendar month. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall cover the oil shipments received during the previous calendar quarters.

5. The permittee shall submit annual reports which specify the total NO_x, SO₂, PM/PM₁₀ and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day hours of operation when burning No. 2 fuel oil limitation and, for the first 12 calendar months of operation following the start-up of this emissions unit, all exceedances of the maximum allowable cumulative hours of operation when burning No. 2 fuel oil limitation.
7. The permittee shall submit deviation (excursion) reports which identify each day during which No. 2 oil was burned in this emissions unit and a one hour visible particulate emissions test was not performed.
8. The permittee shall submit deviation (excursion) reports which identify each day during which there was an exceedance of the lb/MMBtu and lbs/hr limitations or the rolling, 365-day summation totals for NO_x and CO emissions as established in term A.I.1. above.
9. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate limitation shall be demonstrated by the Methods outlined in 40 CFR Part 60, Appendix A, Method 9.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility;
 - b. the emissions testing shall be conducted to demonstrate compliance with the allowable NO_x and CO limitations;
 - c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Method 7 and

10. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services; and,

- d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with the sulfur dioxide emission limitations in terms A.I. and A.II.2. shall be determined by the fuel oil analysis and recordkeeping requirements specified in term A.III.3.
4. Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the application for PTI 14-05026 submitted September 29, 2000. For PM and PM10, compliance will be based on the emission factors described in Compilation of Air Pollution Emission Factors, Volume I: Stationary Point and Area Sources, Fifth Edition, AP-42 Section 1.4 for natural gas firing conditions and Section 1.3 for No. 2 fuel oil firing conditions. Compliance with the NOx and CO emission limitations outlined in this permit shall be demonstrated by the recordkeeping

Emissions Unit ID: B043

requirements specified in terms A.III.7., A.III.8., A.III.9., A.III.10., A.III.11. and A.III.12.

5. Compliance with the hours of operation when burning No. 2 fuel oil limitation in term A.II.3 will be demonstrated by the recordkeeping requirements specified in term A.III.5.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.
2. The following is a summary of the netting emissions in tons per year (TPY):

<u>Emissions Unit</u>	<u>Pollutant</u>	<u>Decrease</u>	<u>Increase</u>
B043 (1431390903) (PTI 14-05026)	PM10		+21.47
P148-P149 (1431390903) (PTI 14-4785)	PM10		+5.02
P023 modification (1431390903) (PTI 14-4633)	PM10		+0.002
Milled bar soap changes totals since 1996 (1431390903)	PM10		+9.74
T009 (1431390903) (PTI 14-4279)	PM10		+0.025
P010, P111, P115, P063 (1431390903)	PM10	-30.73*	
B008 (1431390903)	PM10	-0.18**	
B001 (1431390903)	PM10	-0.53**	

B021 (1431390903)	PM10	-3.53**	
Net Emissions Change	PM10		+1.29
B043 (1431390903) (PTI 14-05026)	SO2		+ 54.24
P023 modification (1431390903) (PTI 14-4633)	SO2		+8.4
P010, P111, P115, P063 (1431390903)	SO2	-0.06*	
B008 (1431390903)	SO2	-1.91**	
B001 (1431390903)	SO2	-5.73**	
B021 (1431390903)	SO2	-355.48**	
Net Emissions Change	SO2	- 300.5	
B043 (1431390903) (PTI 14-05026)	NOx		+ 114.82
P023 modification (1431390903) (PTI 14-4633)	NOx		+0.04
P010, P111, P115, P063 (1431390903)	NOx	-11.24*	
B008	NOx	-1.33**	

Procter & Gamble Co
 PTI Application: 14-05026
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Facility ID: 1431390903

Emissions Unit ID: B043

(1431390903)			
B001 (1431390903)	NOx	-3.19**	
B021 (1431390903)	NOx	-259.57**	
Net Emissions Change	NOx	- 160.47	
B043 (1431390903) (PTI 14-05026)	CO		+112.68
P023 modification (1431390903) (PTI 14-4633)	CO		+0.01

P010, P111, P115, P063 (1431390903)	CO	-9.44*	
B008 (1431390903)	CO	-0.24**	
B001 (1431390903)	CO	-0.46**	
B021 (1431390903)	CO	-8.60**	
Net Emissions Change	CO		+93.95

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B043 - 245 MMBtu/hr gas and No. 2 oil-fired boiler (Boiler #5; IG-10)	Air Toxics Policy	See term B.III.1.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (B043) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexane
 TLV (ug/m3): 176,000

Maximum Hourly Emission Rate (lbs/hr): 0.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4.8

MAGLC (ug/m³): 4190

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

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

- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

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Procter

PTI A₁

Issued: 5/17/2001

Emissions Unit ID: B043

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10) CITY/TWP Cincinnati

SIC CODE 2841 SCC CODE 1-03-006-02 EMISSIONS UNIT ID B043

EMISSIONS UNIT DESCRIPTION 245 MMBtu/hr gas and No. 2 oil-fired boiler (Boiler #5; IG-10)

DATE INSTALLED 6/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.020 lb/MMBtu	21.47	0.020 lb/MMBtu	21.47
PM ₁₀	Attainment	0.020 lb/MMBtu	21.47	0.020 lb/MMBtu	21.47
Sulfur Dioxide	Attainment	0.50 lb/MMBtu	54.24	0.50 lb/MMBtu	54.24
Organic Compounds	Attainment	0.005 lb/MMBtu	5.37	0.005 lb/MMBtu	5.37
Nitrogen Oxides	Attainment	0.17 lb/MMBtu	114.82	0.17 lb/MMBtu	114.82
Carbon Monoxide	Attainment	0.105 lb/MMBtu	112.68	0.105 lb/MMBtu	112.68
Lead	Attainment	9E-6 lb/MMBtu	0.0015	9E-6 lb/MMBtu	0.0015
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR 60

NESHAP? No

PSD? No

OFFSET POLICY? No

Subpart Db

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the limited hours of operation when burning No. 2 fuel oil, emissions limitations and the use of low NOx burners.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Hexane

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10) CITY/TWP Cincinnati

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

[NSR Discussion](#)

Permit Review Narrative
PTI 14-05026

The Procter & Gamble Company
5201 Spring Grove Avenue
Cincinnati, OH 45217
PN: 1431390903

P&G is applying for a PTI for a new 245 MMBtu/hr gas/no. 2 oil boiler, emissions unit B043. The boiler will be equipped with Low NOx burners, a NOx CEM and will have a federally enforceable limit on the annual **hours of operation when burning No. 2 fuel oil**. P&G has netted out of PSD by committing to shut down B021 (a coal-fired boiler) when this new boiler is installed, and by looking at the contemporaneous emissions changes over the last 5 years. Only PM10, SO2, NOx, and CO triggered netting to stay under the PSD modification increase rates. PM, VOC and lead emission increases were all less than the major NSR emission rate thresholds. Following is the emissions netting in tons per year (TPY):

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	PM10		+21.47
P148-P149 (PTI 14-4785)	PM10		+5.02

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10) CITY/TWP Cincinnati

P023 modification (PTI 14-4633)	PM10		+0.002
Milled bar soap changes since 1996	PM10		+9.74
T009 (PTI 14-4279)	PM10		+0.025
P010, P111, P115, P063 shutdown	PM10	-30.73*	
B008 shutdown	PM10	-0.18**	
B001 shutdown	PM10	-0.53**	
B021 shutdown	PM10	-3.53**	
Net Emissions Change	PM10		+1.29

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	SO2		+ 54.24
P023 modification (14-4633)	SO2		+8.4
P010, P111, P115, P063 shutdown	SO2	-0.06*	
B008 shutdown	SO2	-1.91**	
B001 shutdown	SO2	-5.73**	
B021 shutdown	SO2	-355.48**	
Net Emissions Change	SO2	- 300.54	

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	NOx		+ 114.82
P023 modification (PTI 14-4633)	NOx		+0.04
P010, P111, P115, P063 shutdown	NOx	-11.24*	
B008 shutdown	NOx	-1.33**	
B001 shutdown	NOx	-3.19**	
B021 shutdown	NOx	-259.57**	
Net Emissions Change	NOx	- 160.47	

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	CO		+112.68
P023 modification (PTI 14-4633)	CO		+0.01

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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P010, P111, P115, P063 shutdown	CO	-9.44*	
B008 shutdown	CO	-0.24**	
B001 shutdown	CO	-0.46**	
B021 shutdown	CO	-8.60**	
Net Emissions Change	CO		+93.95

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

This boiler is limited to burning only natural gas and No. 2 oil with a sulfur content equivalent to an emission rate of 0.5 lb SO₂/MMBtu. Compliance with the SO₂ limitations is based on fuel supplier analyses and the required recordkeeping and reporting. This also demonstrates compliance with the SO₂ requirements specified under 40 CFR Part 60 Subpart Db. The NO_x emission limitation under Subpart Db is less stringent than the limits set under OAC rule 3745-31-05(A)(3). Since this boiler burns only gas and no. 2 oil, the standard for PM under Subpart Db does not apply. However, the opacity standard under 60.43b(f) does apply when burning No. 2 oil. In lieu of installing a COM, P&G has proposed to perform one hour of Method 9 visible particulate emissions readings each day that oil is burned. P&G will demonstrate compliance with the NO_x limitations by using Low NO_x burners and a NO_x CEM. The permittee will keep daily records of the amount and what type of fuel is being burned, and will submit quarterly deviation reports. Within 6 months after the start-up of this boiler, stack testing is required to determine compliance with the NO_x and CO emission limitations.

No NSR modeling was required. SCREEN3 modeling was run for the Air Toxics Policy, using hexane as a worst case pollutant. The maximum concentration was much lower than the MAGLC for hexane.

The applicable rules are 40 CFR Part 60 Subpart Db, OAC rules 3745-31-05(A)(3), 3745-31-05(D), 3745-17-07(A)(1), 3745-17-10(B)(1), 3745-18-06(D) and 3745-15-07.

A cost effectiveness study was performed for SO₂ and NO_x. Based on this study, additional control equipment was determined not to be cost effective. BAT has been determined to be compliance with all applicable regulations, limited **hours of operation when burning** of No. 2 oil, emissions limitations, the use of low NO_x burners, and compliance with the Air Toxics Policy.

Fee: Fuel-burning at 100-299 MMBtu/hr = \$800/2 (for natural gas/No. 2 oil) = \$400

Permit recommended for approval.

Prepared by: Kari Ball

Date: January 30, 2001

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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Please complete for these type permits ([For PSD/NSR Permit, place mouse over this text](#)): Synthetic Minor Determination and/or Netting DeterminationPermit To Install **14-05026****Netting Determination**

Procter & Gamble Co.

PTI 14-05026

A. Source Description

This PTI is for a 245 MMBtu/hr gas/no. 2 oil boiler, emissions unit B043. P&G will shut down emissions unit B021 (coal fired boiler) when emissions unit B043 is installed and use the last 5 years as the contemporaneous emissions period to net emissions unit B043 out of PSD applicability. The PM10, SO2, NOx and CO emissions will be netted out in this PTI.

B. Facility Emissions and Attainment Status

P&G is major for PM, SO2, NOx, OC and HAPs and is located in Hamilton County which is in attainment for all pollutants.

C. Existing Source Credit:

Boiler #5 (B043) will be replacing Boiler #3 (B021). P&G calculated the actual average emissions for emissions unit B021 for the years 1998 and 1999 based on the fuel consumption for those years. As part of the netting, emissions credits were also used from the St. Bernard detergent plant shutdown (emissions units P010, P111, P115, P063), as well as the shutdown of boilers #1 and #2 (emissions units B008 and B001). The actual average emissions for the St. Bernard detergent plant were calculated from 1997 and 1998 (last two full years of operation), and the actual average emissions from boilers #1 and #2 were calculated from the actual fuel usage from 1998 and 1999. The actual emissions credits for the existing equipment are as follows:

	<u>PM10 (TPY)</u>	<u>SO2 (TPY)</u>	<u>NOx(TPY)</u>	<u>CO(TPY)</u>
St. Bernard detergent plant (P010, P111, P115, P063)	30.73	0.06	11.24	9.44
Boiler #1 (B008)	0.18	1.91	1.33	0.24
Boiler #2 (B001)	0.53	5.73	3.19	0.46
Boiler #3 (B021)	<u>3.53</u>	<u>355.48</u>	<u>259.57</u>	<u>8.60</u>
Totals:	34.97	363.18	275.33	18.74

D. Contemporaneous Emissions Increases and Decreases:

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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There have been four contemporaneous emissions increases for PM10, SO2, NOx or CO at this facility during the past 5 years. The following is a summary of the net emission changes for PM10, SO2, NOx and CO in TPY:

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	PM10		+21.47
P148-P149 (PTI 14-4785)	PM10		+5.02
P023 modification (PTI 14-4633)	PM10		+0.002
Milled bar soap changes since 1996	PM10		+9.74
T009 (PTI 14-4279)	PM10		+0.025
P010, P111, P115, P063 shutdown	PM10	-30.73*	
B008 shutdown	PM10	-0.18**	
B001 shutdown	PM10	-0.53**	
B021 shutdown	PM10	-3.53**	
Net Emissions Change	PM10		+1.29

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	SO2		+ 54.24
P023 modification (14-4633)	SO2		+8.4
P010, P111, P115, P063 shutdown	SO2	-0.06*	
B008 shutdown	SO2	-1.91**	
B001 shutdown	SO2	-5.73**	
B021 shutdown	SO2	-355.48**	
Net Emissions Change	SO2	- 300.54	

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	NOx		+ 114.82
P023 modification (PTI 14-4633)	NOx		+0.04
P010, P111, P115, P063 shutdown	NOx	-11.24*	
B008 shutdown	NOx	-1.33**	
B001 shutdown	NOx	-3.19**	
B021 shutdown	NOx	-259.57**	

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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Net Emissions Change	NOx	- 160.47	
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* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	CO		+112.68
P023 modification (PTI 14-4633)	CO		+0.01
P010, P111, P115, P063 shutdown	CO	-9.44*	
B008 shutdown	CO	-0.24**	
B001 shutdown	CO	-0.46**	
B021 shutdown	CO	-8.60**	
Net Emissions Change	CO		+93.95

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

E. Conclusion

The installation of this new boiler, emissions unit B043, along with the contemporaneous increases and decreases will result in a net decrease of NOx and SO2 emissions and an increase below the significant level for PM10 and CO. Therefore, this new boiler has netted out of the Prevention of Significant Deterioration policy.

Prepared by: Kari Ball

Date: January 30, 2001

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026

Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired
boiler (Boiler No. 5; IG-10).

CITY/TWP Cincinnati

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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Synthetic Minor Determination

Procter & Gamble Co.

PTI 14-05026

A. Source Description

This PTI is for a 245 MMBtu/hr gas/No. 2 oil fired boiler with low NOx burners. P&G will be replacing an existing coal-fired boiler with this new boiler.

B. Facility Emissions and Attainment Status

P&G is major for PM, SO2, NOx, OC and HAPs and is located in Hamilton County which is in attainment for all pollutants.

C. Source Emissions

The emissions from this boiler are: **54.24** TPY SO2, **114.82** TPY NOx, 112.68 TPY CO, 5.37 TPY OC, 21.47 TPY PM/PM10 and **0.0015** TPY Pb. These emissions limitations are based on a full operation schedule of 8760 hrs/yr for natural gas (2,146,200,000 scf/yr) and an allowable annual No. 2 oil **hours of operation rate of 876 hrs/yr** . This No. 2 oil **hours of operation limit** is based on a rolling, **365-day** summation of the **daily emissions** . Quarterly deviation reports will ensure compliance with the usage limits. By limiting the **hours or operation when burning No. 2 fuel oil, nad hence the** No. 2 fuel oil usage rate, the TPY limitations will not trigger the PSD threshold.

D. Conclusion

By limiting the annual **hours of operation when burning** No. 2 oil , the potential emissions of SO2 is limited to less than the PSD thresholds. The permittee will maintain daily records of fuel usage, monthly records of the rolling, 12-month summation for no. 2 oil usage, and will submit quarterly deviation reports. Based upon these limitations, the requirements of the Prevention of Significant Deterioration will not apply.

Prepared by: Kari Ball
Date: January 30, 2001

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10) CITY/TWP Cincinnati

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
SO2	54.24
NOx	114.82
CO	112.68
OC	5.37
PM/PM10	21.47
Pb	

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

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10) CITY/TWP Cincinnati

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

Mark as appropriate and insert date if warranted:

<input checked="" type="checkbox"/>	Date of Publication in Newspaper - March 1, 2001	<input type="checkbox"/>	Draft Date + 50 Days
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Comments Received (Mark each row as appropriate with an 'X' and enter the appropriate information)

Add rows as applicable:

<input type="checkbox"/>	No Comments Received	
<input checked="" type="checkbox"/>	USEPA	March 14, 2001
<input checked="" type="checkbox"/>	Procter & Gamble	March 26, 2001

Final Recommendation (Mark one row as appropriate):

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

Reviewing Engineer:

Kari Ball; April 25, 2001	Enter Name and Date Here
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District Office Review (Required for local air agencies only if final recommendation differs from the preliminary staff determination):

Enter Name and Date Here	Enter Name and Date Here
---------------------------------	---------------------------------

Central Office Review (Required for local air agencies only if final recommendation differs from the preliminary staff determination):

Enter Name and Date Here	Enter Name and Date Here
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This form and the accompanying final version of the PTI must be forwarded to the airptiuser@epa.state.oh.us within 30 days of the end of the comment period or receipt of record of a public meeting if one had been held.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10) CITY/TWP Cincinnati

Synthetic Minor Determination and/or Netting Determination

Permit To Install 14-05026

Netting Determination

Procter & Gamble Co.

PTI 14-05026

A. Source Description

This PTI is for a 245 MMBtu/hr gas/no. 2 oil boiler, emissions unit B043. P&G will shut down emissions unit B021 (coal fired boiler) when emissions unit B043 is installed and use the last 5 years as the contemporaneous emissions period to net emissions unit B043 out of PSD applicability. The PM10, SO2, NOx and CO emissions will be netted out in this PTI.

B. Facility Emissions and Attainment Status

P&G is major for PM, SO2, NOx, OC and HAPs and is located in Hamilton County which is in attainment for all pollutants.

C. Existing Source Credit:

Boiler #5 (B043) will be replacing Boiler #3 (B021). P&G calculated the actual average emissions for emissions unit B021 for the years 1998 and 1999 based on the fuel consumption for those years. As part of the netting, emissions credits were also used from the St. Bernard detergent plant shutdown (emissions units P010, P111, P115, P063), as well as the shutdown of boilers #1 and #2 (emissions units B008 and B001). The actual average emissions for the St. Bernard detergent plant were calculated from 1997 and 1998 (last two full years of operation), and the actual average emissions from boilers #1 and #2 were calculated from the actual fuel usage from 1998 and 1999. The actual emissions credits for the existing equipment are as follows:

	<u>PM10 (TPY)</u>	<u>SO2 (TPY)</u>	<u>NOx(TPY)</u>	<u>CO(TPY)</u>
St. Bernard detergent plant (P010, P111, P115, P063)	30.73	0.06	11.24	
Boiler #1 (B008)	0.18	1.91	1.33	0.2
Boiler #2 (B001)	0.53	5.73	3.19	4
Boiler #3 (B021)	<u>3.53</u>	<u>355.48</u>	<u>259.57</u>	6

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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Totals:	34.97	363.18	<u>8.60</u> 275.33
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18.
74**D. Contemporaneous Emissions Increases and Decreases:**

There have been four contemporaneous emissions increases for PM10, SO2, NOx or CO at this facility during the past 5 years. The following is a summary of the net emission changes for PM10, SO2, NOx and CO in TPY:

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	PM10		+21.47
P148-P149 (PTI 14-4785)	PM10		+5.02
P023 modification (PTI 14-4633)	PM10		+0.002
Milled bar soap changes since 1996	PM10		+9.74
T009 (PTI 14-4279)	PM10		+0.025
P010, P111, P115, P063 shutdown	PM10	-30.73*	
B008 shutdown	PM10	-0.18**	
B001 shutdown	PM10	-0.53**	
B021 shutdown	PM10	-3.53**	
Net Emissions Change	PM10		+1.29

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	SO2		+ 54.24
P023 modification (14-4633)	SO2		+8.4
P010, P111, P115, P063 shutdown	SO2	-0.06*	
B008 shutdown	SO2	-1.91**	
B001 shutdown	SO2	-5.73**	
B021 shutdown	SO2	-355.48**	
Net Emissions Change	SO2	- 300.54	

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	NOx		+ 114.82
P023 modification (PTI 14-4633)	NOx		+0.04
P010, P111, P115, P063 shutdown	NOx	-11.24*	
B008 shutdown	NOx	-1.33**	
B001 shutdown	NOx	-3.19**	
B021 shutdown	NOx	-259.57**	
Net Emissions Change	NOx	- 160.47	

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

Emissions Unit	Pollutant	Decrease	Increase
B043 (PTI 14-05026)	CO		+112.68
P023 modification (PTI 14-4633)	CO		+0.01
P010, P111, P115, P063 shutdown	CO	-9.44*	
B008 shutdown	CO	-0.24**	
B001 shutdown	CO	-0.46**	
B021 shutdown	CO	-8.60**	
Net Emissions Change	CO		+93.95

* Based on average actual emissions for 1997 and 1998.

** Based on average actual emissions for 1998 and 1999.

E. Conclusion

The installation of this new boiler, emissions unit B043, along with the contemporaneous increases and decreases will result in a net decrease of NOx and SO2 emissions and an increase below the significant level for PM10 and CO. Therefore, this new boiler has netted out of the Prevention of Significant Deterioration policy.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati

ress:
Gov.
enter

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
HAMILTON COUNTY
Application No: 14-05026

DATE: 2/27/2001

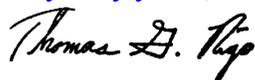
Procter & Gamble Co
 Brian Bachman
 5201 Spring Grove Ave
 Cincinnati, OH 45217

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,



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

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION 245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10). CITY/TWP Cincinnati

CC: USEPA HCDES KY IN OH-KY-IN Reg Coun of Govt



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-05026

Application Number: 14-05026
APS Premise Number: 1431390903
Permit Fee: **To be entered upon final issuance**
Name of Facility: Procter & Gamble Co
Person to Contact: Brian Bachman
Address: 5201 Spring Grove Ave
Cincinnati, OH 45217

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5201 Spring Grove Ave
Cincinnati, Ohio**

Description of proposed emissions unit(s):
245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

NEW SOURCE REVIEW FORM B

PTI Number: 14-05026 Facility ID: 1431390903

FACILITY NAME Procter & Gamble Co

FACILITY DESCRIPTION	245 MMBtu/hr gas and no. 2 oil-fired boiler (Boiler No. 5; IG-10).	CITY/TWP	Cincinnati
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Director