Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

8/26/2010

Certified Mail

Facility ID: 0374000022
Permit Number: P0106427
County: Seneca

Jason Trausch
Church & Dwight Co.
2501 East County Road 34
Old Fort, OH 44861

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Administrative Permit Modification

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Church & Dwight Co.

Facility ID:	0374000022
Permit Number:	P0106427
Permit Type:	Administrative Permit Modification
Issued:	8/26/2010
Effective:	8/26/2010
Expiration:	8/13/2014

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Church & Dwight Co.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 6
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 8
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 10
15. Operational Flexibility 10
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 11
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 12
22. Permanent Shutdown of an Emissions Unit 12
23. Title VI Provisions 12
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 13
25. Records Retention Requirements Under State Law Only 13
26. Inspections and Information Requests 13
27. Scheduled Maintenance/Malfunction Reporting 14
28. Permit Transfers 14

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 14

B. Facility-Wide Terms and Conditions 15

C. Emissions Unit Terms and Conditions 18

1. F001 19
2. P010 21
3. P036 28
4. P039 31
5. P040 34
6. Emissions Unit Group - MEGALAC North Group: P011, P012, P020, ... 37
7. Emissions Unit Group - Megalac South Group: P033, P034, ... 40
8. Emissions Unit Group - Sodium Bicarbonate Group: P005, P031, ... 43

Authorization

Facility ID: 0374000022
Facility Description: Sodium bicarbonate manufacturing.
Application Number(s): M0000773
Permit Number: P0106427
Permit Description: Administrative Permit Amendment to correct the description of P015 from Armex #1/#2 to Flow K process
Permit Type: Administrative Permit Modification
Issue Date: 8/26/2010
Effective Date: 8/26/2010
Expiration Date: 8/13/2014
Superseded Permit Number: P0087670

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

Church & Dwight Co.
2501 East County Road 34
Old Fort, OH 44861

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

1. All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) 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, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate

statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need

to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by

law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall

furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P010, P036, and P039 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [Authority for term: 40 CFR Part 64]

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install, or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

   a) B001 – 7.32 mmBtu/hr boiler;

   b) B002 – 7.32 mmBtu/hr boiler;

   c) B003 – 7.32 mmBtu/hr boiler;

   d) B004– 7.32 mmBtu/hr boiler;

   e) B007 – 7.32 mmBtu/hr boiler;

   f) P001 – liquor preparation #1 (PTI #03-6955, issued 06-03-1993);

   g) P002 – crystal formation with scrubber and carbonator vent (PTI #03-6955, issued 06-03-1993);

   h) P003 – crystal separation #1 (PTI #03-673, issued 09-23-1982);

   i) P004 – drying #1 (PTI #03-673, issued 09-23-1982);

   j) P007 – lime storage and transfer (PTI #03-13167, issued 06-23-1999);

   k) P013 – treated free-flowing (TFF) bulk loading (PTI #03-3657, issued 06-22-1988);

   l) P014 – 1# packaging line and 2/#4 packing line (PTI #03-3753, modification issued 04-15-08);

   m) P015 – Flow K process (PTI #03-4757, issued 11-22-1989);

   n) P017 – TFF bagging (PTI #03-5272, issued 08-29-1990);

   o) P018 – D-5 packline (PTI #03-5500, issued 01-24-1991);

   p) P022 – crystal separation #2 (PTI #03-6955, issued 06-03-1993);

   q) P023 – drying #2 (PTI #03-6955, issued 06-03-1993);

   r) P024 – Armex manufacturing (PTI #03-7328, issued 06-16-1993);

s) P026 – 2/#4 packing line (PTI #03-08223, modification issued 04-15-08);

t) P027 – active process, cat/carpet deodorizer elevator and bin (PTI #03-14013, modification issued 03-13-08);

u) P032 – Armex profile dry blend (PTI #03-8600, issued 03-22-1995).

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR 63.52(a)(2)]

4. The following emissions unit located at this facility is subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

a) P100 – emergency electrical generator (PBR #02028, effective 11-21-07).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-03(A)(4)(b)]

C. Emissions Unit Terms and Conditions

1. F001

Operations, Property and/or Equipment Description:

Fugitive Emissions From Traffic

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-673, issued 06-29-1978)	See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. No emissions limitations or control requirements were established under this rule in PTI #03-673.

b. This emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This facility is not located within the areas identified in “Appendix A” of OAC rule 3745-17-08 (it is located in Seneca County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

2. P010

Operations, Property and/or Equipment Description:

North Megalac Bulk Reaction Conveyor and Bagging (PTI 03-17457)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17457, issued 09-23-2008)	0.03 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 7.88 tons PE/year Visible emissions shall not exceed 5 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(3) and e)(1)

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse capable of achieving a maximum outlet concentration of 0.03 grain PE/dry standard cubic foot. BAT requirements also include compliance with the terms and conditions of this permit.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

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

[OAC rule 3745-77-07(C)(1), PTI #03-17457, and 40 CFR, Part 64]

(2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC rule 3745-77-07(C)(1), PTI #03-17457, and 40 CFR, Part 64]

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1), PTI #03-17457, and 40 CFR, Part 64]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions from the baghouse stack serving this emissions unit and/or any visible fugitive particulate emissions from the egress points were observed, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA

District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1), PTI #03-17457, and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:
0.03 grain PE/dscf

Applicable Compliance Method:
This emission limitation was established in accordance with the maximum outlet concentration of the baghouse. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. Emission Limitation:
7.88 tons PE/year

Applicable Compliance Method:
The annual limitation was established by multiplying the maximum outlet concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate (7,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation will be assumed.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) None.

2. P019

Operations, Property and/or Equipment Description:

North Megalac Bin Curing Systems (PTI 03-5904)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-5904, issued 10-30-1991)	0.03 grains (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 2.04 lbs PE/hr and 8.94 tons PE/yr Visible PE shall not exceed 0% opacity as a 6-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee employs four product recovery bin vents on emissions unit P019. Each filter is capable of achieving a maximum outlet concentration of 0.03 gr PE/dscf.

b. The Best Available Technology (BAT) requirement for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

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

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
0.03 grains PE/dscf

<u>Applicable Compliance Method</u>:
This emission limitation was established in accordance with the maximum outlet concentration of the baghouse. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

b. <u>Emission Limitation</u>:
2.04 lbs PE/hr and 8.94 tons PE/year

<u>Applicable Compliance Method</u>:
The hourly and annual limitations were established by multiplying the maximum outlet concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate of 8,000 acfm (2,000 acfm/vent x 4 vents), and using the following conversion factors in order to convert to pounds per hour and tons per year: 1 pound/7,000

grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation will be assumed.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

c. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI #03-5904]

g) Miscellaneous Requirements

(1) None.

3. P036

Operations, Property and/or Equipment Description:

South Megalac Process Reactor (PTI 03-13167)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17457, issued 09-23-2008)	0.02 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 3.75 tons PE/year Visible emissions shall not exceed 0 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(3) and e)(1)

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse capable of achieving a maximum outlet concentration of 0.02 grain PE/dry standard cubic foot. BAT requirements also include compliance with the terms and conditions of this permit.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

(2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:
0.02 grain PE/dscf

Applicable Compliance Method:
This emission limitation was established in accordance with the maximum outlet concentration of the baghouse. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. Emission Limitation:
3.75 tons PE/year

Applicable Compliance Method:
The annual limitation was established by multiplying the maximum outlet concentration (0.02 gr PE/dscf) by the maximum volumetric air flow rate (5,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation will be assumed.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) None.

4. P039

Operations, Property and/or Equipment Description:

Cat Litter Manufacturing Line (PTI 03-13515)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13515, modification issued 03-13-2008)	0.01 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 0.62 lb PE/hr, and 2.72 tons PE/year Visible emissions shall not exceed 0 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(3) and e)(1)

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with an outlet grain loading of 0.01 gr/dscf.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13515]

(2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC rule 3745-77-07(C)(1) and PTI #03-13515]

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and PTI #03-13515]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:
0.01 grain PE/dscf

Applicable Compliance Method:
This emission limitation was established in accordance with the maximum outlet concentration of the baghouse. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-13515]

b. Emission Limitation:
0.62 lb PE/hr, and 2.72 tons PE/year

Applicable Compliance Method:
The hourly limitation was established by multiplying the maximum outlet concentration (0.01 gr PE/dscf) by the maximum volumetric air flow rate (7,200 acfm), and using the following conversion factors in order to convert to lbs per hour: 1 pound/7,000 grains, 60 minutes/hour.

The annual limitation was established by multiplying the lbs/hr by 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.01 gr PE/dscf limitation, compliance with the hourly and annual limitations will be assumed.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-13515]

c. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) None.

5. P040

Operations, Property and/or Equipment Description:

2500 GPM Noncontact Cooling Tower (PTI 03-17434)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a) (PTI #03-17434, issued 09-04-2008)	1.75 pounds particulate matter 10 microns or less in size (PM10)/hour; 7.67 tons PM10/year Visible emissions shall not exceed 5 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirement for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a). This determination is based on all emissions of particulate matter being PM10 and the established PM10 limitation being more restrictive than the particulate emissions limitation established by OAC rule 3745-17-11(B)(5)(a). Particulate emissions (PE) measured using Method 5 of 40 CFR Part 60, Appendix A would be equivalent to the filterable particulates measured using Method 201/201A of 40 CFR, Part 51, Appendix M. A PM10 limitation is more stringent due to the inclusion of condensible particulate matter measured by Method 202 of 40 CFR, Part 51, Appendix M.

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

c) Operational Restrictions

(1) The permittee shall maintain the total dissolved solids (TDS) content of the circulating cooling water at 7,000 mg/L or less, as a monthly average.

[OAC rule 3745-77-07(A)(1) and PTI #03-17434]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall determine the TDS content, in mg/L, of the cooling tower water in accordance with the following:

a. Conductivity shall be used to determine the TDS content of the cooling tower water based on an established correlation (or index) between TDS and conductivity of the cooling water.

b. The permittee shall properly install, operate, and maintain equipment to continuously monitor and electronically record the conductivity of the cooling tower water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

c. The permittee shall employ a computerized data management system to determine the conductivity based on a monthly average of the electronically recorded information.

d. If the continuous conductivity monitor malfunctions or is otherwise not operational for greater than a 24-hour period:

i. The permittee shall notify the Ohio EPA district office or local air agency of such malfunction as soon as practicable, but not later than twenty-four hours after the discovery of the event. Notification shall take the form of a telephone call, fax, or other electronic notification.

ii. The duration of the equipment malfunction shall be recorded.

iii. The permittee shall perform and record daily conductivity tests of samples from the cooling tower water until the malfunction is resolved. The results of the samples shall be applied to the monthly conductivity calculation.

iv. The Ohio EPA district office or local air agency shall be notified when the condition causing the malfunction was corrected and the equipment is again in operation. Notification shall take the form of a telephone call, fax, or other electronic notification and shall occur as expeditiously as practicable, but no later than two weeks after the correction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any exceedances of the TDS content requirement. These reports shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:
1.75 pounds PM10/hour and 7.67 tons PM10/year

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum water flow rate of 2,500 gallons/minute by the drift loss factor of 0.0002, the total dissolved solids content (in mg/L), and applying the conversion factors of 60 minutes/hour, 3.785412 L/gal, and 453,592.4 mg/pound to convert to pounds/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

b. Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17434]

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - MEGALAC North Group: P011, P012, P020,

EU ID	Operations, Property and/or Equipment Description
P011	Megalac Cooler conveying, screening, milling, super sacking (PTI 03-17457) (now includes P012, P020, and P025)
P012	Megalac Conveying, screening, milling, super sacking (PTI 03-17457).
P020	Megalac Bulk Truck and Rail Loading (PTI 03-17457)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17457, issued 09-23-2008)	<u>combined emission limits for P011, P012, and P020 (baghouse M-116)</u>: 0.03 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf); 7.88 tons PE/year Visible emissions shall not exceed 5 percent opacity, as a six-minute average. See b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee employs a common product recovery baghouse (M-116) on emissions units P011, P012, and P020 that is capable of achieving a maximum outlet concentration of 0.03 gr PE/dscf.

b. Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
combined emission limit for P011, P012, and P020 - 0.03 grain PE/dscf

<u>Applicable Compliance Method</u>:
This emission limitation was established in accordance with the maximum outlet concentration of the baghouse. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. <u>Emission Limitation</u>:
combined emission limit for P011, P012, and P020 – 7.88 tons PE/yr

Applicable Compliance Method:
The annual limitation was established by multiplying the maximum outlet concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate (7,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.03 gr PE/dscf limitation, compliance with the annual limitation will be assumed.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Megalac South Group: P033, P034,

EU ID	Operations, Property and/or Equipment Description
P033	Megalac Curing Bins (PTI 03-13167)
P034	South Megalac Reactor Cooling (tied into P035) (PTI 03-14017)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17457, issued 09-23-2008)	0.02 grain (gr) particulate emissions (PE)/dry standard cubic foot (dscf) and 5.58 tons PE/year for P033 0.02 gr PE/dscf and 7.51 tons PE/year for P034 Visible emissions shall not exceed 0 percent opacity, as a six-minute average. See b)(2)a. through b)(2)c.
b.	OAC rule 3745-17-11(B)	See b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee employs three product recovery bin vents (M-245, M-246, and M-247) on emissions unit P033. Each filter is capable of achieving a maximum outlet concentration of 0.02 gr PE/dscf.

b. The permittee employs a product recovery baghouse (M-216) on emissions unit P034 that is capable of achieving a maximum outlet concentration of 0.02 gr PE/dscf.

c. Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
0.02 grain PE/dscf for P033 and P034, individually

<u>Applicable Compliance Method</u>:
This emission limitation was established in accordance with the maximum outlet concentration of the bin vents. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

b. Emission Limitation:
5.58 tons PE/year for P033 and 7.51 tons PE/year for P034

Applicable Compliance Method:
The annual limitation for P033 was established by summing the annual emissions from each of the three bin vents, calculated by multiplying the maximum outlet concentration (0.02 gr PE/dscf) by the maximum volumetric air flow rate (2,475 acfm/bin vent), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds.

The annual limitation for P034 was established by multiplying the maximum outlet concentration (0.02 gr PE/dscf) by the maximum volumetric air flow rate (10,000 acfm), and using the following conversion factors in order to convert to tons per year: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.02 gr PE/dscf limitation, compliance with the annual limitation will be assumed.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

c. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17457]

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group - Sodium Bicarbonate Group: P005, P031,

EU ID	Operations, Property and/or Equipment Description
P005	Classification, Conveying and Bagging with Baghouse (was P901) - no fugitives (PTI 03-8045)
P031	Non USP Bagger

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17433, modification issued 04-15-2008)	7.54 lbs particulate emissions (PE)/hr and 33.0 tons PE/yr for P005 1.42 lbs PE/hr and 6.22 tons PE/yr for P031 Visible emissions shall not exceed 0 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements have been determined to be the use of two product recovery baghouses for P005, and one product recovery baghouse for P031, each capable of achieving a maximum outlet grain loading of 0.03 grains PE/dscf.

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

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

d.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
7.54 lbs PE/hr and 33.0 tons PE/yr for P005

<u>Applicable Compliance Method</u>:
The permittee may demonstrate compliance with the hourly emissions limitation by summing the hourly emissions from the two baghouses controlling this emissions unit. The hourly emissions were calculated by multiplying the maximum outlet PE concentrations of each baghouse (0.03 gr PE/dscf) by the corresponding maximum volumetric air flow rates (DC-101 = 9,000 ACFM; DC-201 = 20,000 ACFM), and using the following conversion factors in order to convert to lb/hr: 60 minutes/hr and 1 lb/7,000 grains. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000

lbs/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

b. Emission Limitation:
1.42 lbs PE/hr and 6.22 tons PE/yr for P031

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly emissions limitation by multiplying the maximum outlet PE concentration (0.03 gr PE/dscf) by the maximum volumetric air flow rate (5,000 ACFM), and using the following conversion factors in order to convert to pounds per hour: 1 pound/7,000 grains, 60 minutes/hour. If required, compliance with this limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1-5.

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

c. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI #03-17433]

g) Miscellaneous Requirements

(1) None.