



**Environmental
Protection Agency**

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

1/5/2011

JOHN KODURU
ROYAL CHEMICAL CO
1755 Enterprise Pky
Suite 100
Twinsburg, OH 44087

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677080001
Permit Number: P0107382
Permit Type: Renewal
County: Summit

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. 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 PTI 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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the 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: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ROYAL CHEMICAL CO**

Facility ID: 1677080001
Permit Number: P0107382
Permit Type: Renewal
Issued: 1/5/2011
Effective: 1/5/2011
Expiration: 1/5/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
ROYAL CHEMICAL CO

Table of Contents

Authorization 1
A. Standard Terms and Conditions 4
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 5
2. Who is responsible for complying with this permit? 5
3. What records must I keep under this permit? 5
4. What are my permit fees and when do I pay them?..... 5
5. When does my PTIO expire, and when do I need to submit my renewal application? 5
6. What happens to this permit if my project is delayed or I do not install or modify my source? 6
7. What reports must I submit under this permit? 6
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 7
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 8
B. Facility-Wide Terms and Conditions..... 9
C. Emissions Unit Terms and Conditions 11
1. Emissions Unit Group - Bulk Storage Silos: P019, P020, P021, P022,..... 12
2. Emissions Unit Group - Dry Blending of Products: P009, P010,..... 15
3. Emissions Unit Group - Mild Steel Mixer PM-3: P011,..... 18
4. Emissions Unit Group - Packaging/Tableting of Products: P901, P902, P903, P904, P906,..... 21

Authorization

Facility ID: 1677080001
Application Number(s): A0040975
Permit Number: P0107382
Permit Description: PTIO renewal for 12 emissions units used to produce laundry detergents.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/5/2011
Effective Date: 1/5/2011
Expiration Date: 1/5/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ROYAL CHEMICAL CO
8679 FREEWAY DR
MACEDONIA, OH 44056

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

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Chris Korleski
Director



Authorization (continued)

Permit Number: P0107382
Permit Description: PTIO renewal for 12 emissions units used to produce laundry detergents.

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

Group Name: Bulk Storage Silos

Emissions Unit ID:	P019
Company Equipment ID:	T-8
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	T-9
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	T-12
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	T-13
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable

Group Name: Dry Blending of Products

Emissions Unit ID:	P009
Company Equipment ID:	PM-1
Superseded Permit Number:	P0103329
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	PM-2
Superseded Permit Number:	P0103329
General Permit Category and Type:	Not Applicable

Group Name: Mild Steel Mixer PM-3

Emissions Unit ID:	P011
Company Equipment ID:	PM-3
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable

Group Name: Packaging/Tableting of Products

Emissions Unit ID:	P901
Company Equipment ID:	Bagger-1
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P902
Company Equipment ID:	Bagger-2
Superseded Permit Number:	16-02124

Final Permit-to-Install and Operate

ROYAL CHEMICAL CO

Permit Number: P0107382

Facility ID: 1677080001

Effective Date: 1/5/2011

General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P903
Company Equipment ID:	All-Fill
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P904
Company Equipment ID:	Form-Fill-Seal
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P906
Company Equipment ID:	Pelletizer-2
Superseded Permit Number:	16-02124
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above. The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2). The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred. If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31. You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official. You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated. Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

B. Facility-Wide Terms and Conditions

Final Permit-to-Install and Operate

ROYAL CHEMICAL CO

Permit Number: P0107382

Facility ID: 1677080001

Effective Date: 1/5/2011

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Bulk Storage Silos: P019, P020, P021, P022,

EU ID	Operations, Property and/or Equipment Description
P019	210,000 pound capacity bulk storage silo T-8 with a baghouse as control.
P020	210,000 pound capacity bulk storage silo T-9 with a baghouse as control.
P021	500,000 pound capacity bulk storage silo T-12 with a baghouse as control.
P022	500,000 pound capacity bulk storage silo T-13 with a baghouse as control.

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Stack emissions from each emissions unit of this emissions unit group shall not exceed 0.5 pound/hour and 2.2 tons/year of particulate emissions (PE).
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(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).

(2) Additional Terms and Conditions

a. The 0.5 pound/hour and 2.2 tons/year of PE established pursuant to OAC rule 3745-31-05(A)(3) are greater than the potential to emit for each emissions unit of

this emissions unit group. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

- b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in the method of operation, or any other change in any emissions unit of this emissions unit group that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, when any emissions unit(s) of this emissions unit group is(are) in operation and weather conditions allow, for visible PE from any stack(s) serving this emissions unit group. The presence or absence 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which visible PE were observed from any stack(s) serving this emissions unit group; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.

f) Testing Requirements

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

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Stack emissions from each emissions unit of this emissions unit group shall not exceed 0.5 pound/hour and 2.2 tons/year of PE.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) This permit supersedes all of the requirements of Permit to Install (PTI) 16-02124 issued final July 17, 2001.

2. Emissions Unit Group - Dry Blending of Products: P009, P010,

EU ID	Operations, Property and/or Equipment Description
P009	Dry blending of products.
P010	Dry blending of products.

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	Stack emissions from each emissions unit of this emissions unit group shall not exceed 7.58 pounds/hour of PE.

(2) Additional Terms and Conditions

a. The 7.58 pounds/hour of PE from OAC rule 3745-17-11(B) is greater than the potential to emit for each emissions unit of this emissions unit group. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with this emissions limit.

b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in the method of operation, or any other change in

any emissions unit of this emissions unit group that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when any emissions unit(s) of this emissions unit group is(are) in operation and weather conditions allow, for visible PE from any stack(s) serving this emissions unit group. The presence or absence 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. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

- a. all days during which visible PE were observed from any stack(s) serving this emissions unit group; and
- b. any corrective actions taken to minimize or eliminate the visible PE.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Stack emissions from each emissions unit of this emissions unit group shall not exceed 7.58 pounds/hour of PE.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Mild Steel Mixer PM-3: P011,

EU ID	Operations, Property and/or Equipment Description
P011	5,000 pound capacity mild steel mixer PM-3 with a baghouse as control.

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Stack emissions from this emissions unit shall not exceed 0.5 pound/hour and 2.2 tons/year of particulate emissions (PE).
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(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).

(2) Additional Terms and Conditions

a. The 0.5 pound/hour and 2.2 tons/year of PE established pursuant to OAC rule 3745-31-05(A)(3) are greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

Final Permit-to-Install and Operate

ROYAL CHEMICAL CO

Permit Number: P0107382

Facility ID: 1677080001

Effective Date: 1/5/2011

- b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in the method of operation, or any other change in any emissions unit of this emissions unit group that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted..
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when this emissions unit is in operation and weather conditions allow, for visible PE from any stack(s) serving this emissions unit. The presence or absence 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- e) Reporting Requirements
 - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which visible PE were observed from any stack(s) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.
- f) Testing Requirements
 - (1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Stack emissions from this emissions unit shall not exceed 0.5 pound/hour and 2.2 tons/year of PE.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) This permit supersedes all of the requirements of Permit to Install (PTI) 16-02124 issued final July 17, 2001.

4. Emissions Unit Group - Packaging/Tableting of Products: P901, P902, P903, P904, P906,

EU ID	Operations, Property and/or Equipment Description
P901	bagging machine with a local bag filter as control - Bagger 1.
P902	bagging machine with a baghouse as control - Bagger 2.
P903	All-Fill packaging equipment with a local dust collector as control.
P904	Form-Fill-Seal packaging machine with a local bag filter as control.
P906	Pelletizer 2 with a local bag filter as control.

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Stack emissions from each emissions unit of this emissions unit group shall not exceed 0.5 pound/hour and 2.2 tons/year of particulate emissions (PE). The permittee shall employ hoods, ducts, fans, and other equipment to adequately enclose, contain, capture, vent and control fugitive dust. The collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(11)(e)	The visible PE limitations specified in paragraphs (B)(1) to (B)(9) of OAC rule 3745-17-07 shall not apply to any fugitive dust source which is not located within the geographical areas specified in appendix A of rule 3745-17-08 of the Administrative Code, unless the director, in accordance with paragraph (A)(2) of rule 3745-17-08 of the Administrative Code, requires the owner or operator to submit and implement a control program which will bring the fugitive dust source into compliance with the requirements of paragraph (B) of rule 3745-17-08 of the Administrative Code.
d.	OAC rule 3745-17-08(A)(1)	This emissions unit group (a fugitive dust source) is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, unless pursuant to OAC rule 3745-17-08(A)(2), that in the director's judgment, probable cause exists to believe that such source is causing or contributing to a violation of rule 3745-15-07 or 3745-17-02 of the Administrative Code, the requirements of OAC rule 3745-17-08(B) are not applicable to this emissions unit group.
e.	OAC rule 3745-17-11(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).

(2) Additional Terms and Conditions

- a. The 0.5 pound/hour and 2.2 tons/year of PE established pursuant to OAC rule 3745-31-05(A)(3) are greater than the potential to emit for each emissions unit of this emissions unit group. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.
- b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in the method of operation, or any other change in any emissions unit of this emissions unit group that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de

minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when any emissions unit(s) of this emissions unit group is(are) in operation and weather conditions allow, for visible PE from any stack(s) serving this emissions unit group. The presence or absence 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
- a. all days during which visible PE were observed from any stack(s) serving this emissions unit group; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Stack emissions from each emissions unit of this emissions unit group shall not exceed 0.5 pound/hour and 2.2 tons/year of PE.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) This permit supersedes all of the requirements of Permit to Install (PTI) 16-02124 issued final July 17, 2001.