State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

08/17/07

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

14-31-39-4137
St. Bernard Soap Company
Joseph W. Sodd
5177 Spring Grove Ave
Cincinnati, OH 45217

Dear Joseph W. Sodd:

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.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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 Hamilton County Dept. of Environmental Services.

Sincerely,

Michael W. Ahern

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Hamilton County Dept. of Environmental Services
File, DAPC PIER

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **08/17/07**	Effective Date: **09/07/07**	Expiration Date: **09/07/12**

This document constitutes issuance of a Title V permit for Facility ID: 14-31-39-4137 to:

St. Bernard Soap Company
5177 Spring Grove Avenue
Cincinnati, OH 45217

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P001 (CSM Making System, IS-1A)
Bar soap production (vacuum dryer, start-up receiver, reblend receiver)

P030 (Bar Soap Interim Storage/Back Bins, IS-1C)
Bar soap storage bins

P055 (Ivory Bar Soap Making and Packing, IS-19)
Bar soap production

P104 (Milled Bar Soap Drying System No. 1, IS-21)
Soap drying

P105 (Milled Bar Soap Drying System No. 2, IS-21)
Soap drying

P106 (Milled Bar Soap Drying System No. 3, IS-21)
Soap drying

P107 (Milled Bar Soap Drying System No. 4, IS-21)
Soap drying

P122 (Bar Soap Making System #6)
Bar soap production

P125 (Bar Soap Packing Line E)
Bar soap production

P129 (Flake Bin 1/2)
Flake storage bin

P130 (Bar Soap Making System #1)
Milled Bar Soap Production

P131 (Bar Soap Making System #2)
Milled Bar Soap Production

P132 (Bar Soap Making System #3)
Milled Bar Soap Production

P133 (Bar Soap Making System #4)
Milled Bar Soap Production

P135 (Packing Line A)
Milled Bar Soap Packing Line

P136 (Packing Line B)
Milled Bar Soap Packing Line

P137 (Packing Line C)
Milled Bar Soap Packing Line

P138 (Packing Line D)
Milled Bar Soap Packing Line

P139 (Packing Line F)
Milled Bar Soap Packing Line

P145 (Milled Bar Soap Making System #5)
Milled Bar Soap Making

P150 (Bulk Dry Majors Storage Silo, IS-25d)
Dry material storage silo

P151 (Bulk Dry Majors Use Bin 1/2, IS-25e)
Dry material use bin

P152 (Bulk Dry Majors Use Bin 3/4, IS-25f)
Dry material use bin

P153 (Vacuum Dryer No. 2, IS-54)
Vacuum dryer for soap

P154 (Vacuum Dryer No. 3, IS-55)
Vacuum dryer for soap

P155 (Minor Additions Systems 1 and 2, IS-56)
Dry material use bins

P156 (Making/Packing Line 7-G, IS-57)
Bar soap production and packing

P157 (Making/Packing Line 8-H, IS-58)
Bar soap production and packing

P158 (Making/Packing Line 9-I, IS-59)
Bar soap production and packing

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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 A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.
(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:

i. **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 General Term and Condition A.1.c.ii 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))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II 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 General 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 General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **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 General Term and Condition A.1.c.ii 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; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not

reported in accordance with General Term and Condition A.1.c.ii 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 Part II.A 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 General Term and Condition A.1.c.ii 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))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (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))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. 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 General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. 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))

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 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 upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. 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

   ii. 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

   iii. a combination of i. and ii. above.

   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))

7. Fees

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

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. 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))

11. 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))

12. 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:

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

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

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

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

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

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:

i. 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.

ii. 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.

iii. 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))

13. 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))

14. 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))

15. 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))

16. 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))

17. 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.)

18. 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))

19. 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))

20. 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))

21. 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)

22. 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))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

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

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 General Term and Condition A.1.c.ii; 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

P047 - Base Soap Making Plant
P048 - Base Soap Making Plant
P049 - 9,500 Gallon Brine Mix Tank w/ Fabric Filter, IS-14A
P050 - Glycerine Evaporation, IS-14A
P056 - Central Vacuum System - Bar Soap Making and Packing, IS-20
P126 - Soap Mix Tank
P127 - Soap Mix Tank
P128 - Soap Mix Tank

T009 - 7,000 Gallon Hydrochloric Acid Storage Tank, IS-14A
T010 - 7,000 Gallon Bleach Storage Tank, IS-14A
T092 - 34,985 Gallon Fixed Roof Soap Storage Tank, IS-13P
T093 - 30,620 Gallon Fixed Roof Soap Storage Tank, IS-13Q
T094 - 30, 825 Gallon Fixed Roof Soap Storage Tank, IS-13R
T095 - 33,445 Gallon Fixed Roof Soap Storage Tank, IS-13S

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

The following insignificant emissions units are located at this facility:

P047 - Base Soap Making Plant
P048 - Base Soap Making Plant
P049 - 9,500 Gallon Brine Mix Tank w/ Fabric Filter, IS-14A
P050 - Glycerine Evaporation, IS-14A
P056 - Central Vacuum System - Bar Soap Making and Packing, IS-20
P126 - Soap Mix Tank
P127 - Soap Mix Tank
P128 - Soap Mix Tank

T009 - 7,000 Gallon Hydrochloric Acid Storage Tank, IS-14A
T010 - 7,000 Gallon Bleach Storage Tank, IS-14A
T092 - 34,985 Gallon Fixed Roof Soap Storage Tank, IS-13P
T093 - 30,620 Gallon Fixed Roof Soap Storage Tank, IS-13Q
T094 - 30, 825 Gallon Fixed Roof Soap Storage Tank, IS-13R
T095 - 33,445 Gallon Fixed Roof Soap Storage Tank, IS-13S

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

T096 - Glycerine Storage Tank 121
T097 - Glycerine Storage Tank 122
T098 - Glycerine Storage Tank K3
T099 - Base Soap Storage Tank K7
T100 - Base Soap Storage Tank K9
T101 - Base Soap Storage Tank K11
T102- AGS Storage Tank K23
T103 - STCI Storage Tank K24
T104 - Base Soap Storage Tank K25
T105 - PW/STCI Storage Tank K28
T106 - AGS Storage Tank K29
T107 - Storage Tank K31
T108 - Stearic Acid Storage Tank K32
T109 - Storage Tank K33
T110 - Paraffin Storage Tank K34
T111 - Storage Tank K36
T112 - STCI Storage Tank K37
T113 - Storage Tank K38
T114 - Bar Soap Perfume Tank Farm
T115 - Bar Soap Perfume Tank Day Room

The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

T096 - Glycerine Storage Tank 121
T097 - Glycerine Storage Tank 122
T098 - Glycerine Storage Tank K3
T099 - Base Soap Storage Tank K7
T100 - Base Soap Storage Tank K9
T101 - Base Soap Storage Tank K11
T102- AGS Storage Tank K23
T103 - STCI Storage Tank K24
T104 - Base Soap Storage Tank K25
T105 - PW/STCI Storage Tank K28
T106 - AGS Storage Tank K29
T107 - Storage Tank K31
T108 - Stearic Acid Storage Tank K32
T109 - Storage Tank K33
T110 - Paraffin Storage Tank K34
T111 - Storage Tank K36
T112 - STCI Storage Tank K37
T113 - Storage Tank K38
T114 - Bar Soap Perfume Tank Farm
T115 - Bar Soap Perfume Tank Day Room

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: CSM Making System, IS-1A (P001)

Activity Description: Bar soap production (vacuum dryer, start-up receiver, reblend receiver)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P001 - CSM making system with baghouse IS-1C	OAC rule 3745-31-05(A)(3) (PTI 14-0178)	There were no emission limitations or control requirements established in PTI 14-0178.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B) (based on Figure II of OAC rule 3745-17-11)	PE shall not exceed 5.61 lbs per hour from the fabric filter stack associated with this emissions unit.
	OAC rule 3745-21-07(G)	See A.I.2.

2. Additional Terms and Conditions

2.a This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

(Authority for term: OAC rule 3745-77-07(A)(1))

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

III. Monitoring and/or Record Keeping Requirements (continued)

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 8 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall collect and record the following information for each day that a photochemically reactive material is used in this process:

a. The company identification for each material used; and

b. The maximum hourly and daily emissions calculations for this process.

(Authority for term: OAC rule 3745-77-07(C)(1))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-0178, issued on 11/29/77: A.III.1 - A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

(Authority for term: OAC rules 3745-77-07(C)(1))

2. Prior to employing any photochemically reactive material in this emissions unit, including any cleanup material that is a photochemically reactive material, the permittee shall provide written notification to the appropriate Ohio EPA field office. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

(Authority for term: OAC rules 3745-77-07(C)(1))

3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-0178, issued on 11/29/77: A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
PE shall not exceed 5.61 lbs per hour from the fabric filter stack associated with this emissions unit.

Applicable Compliance Method:

Emissions from the baghouse are determined by multiplying the maximum uncontrolled particulate emissions vented to the baghouse of 17.1 lbs/hr, by the baghouse control efficiency, 99.9%.

(17.1 lbs of PE/hr x (1-0.999) = 0.018 lb of PE/hr).

If required, compliance with the PE limit shall be demonstrated by emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

(Authority for term: OAC rule 3745-77-07(C)1))

1.b Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)1))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-0178, issued on 11/29/77: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term OAC rule 3745-77-07(A)(3)(a)(ii))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P001 - CSM Making System, IS-1A		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bar Soap Interim Storage/Back Bins, IS-1C (P030)

Activity Description: Bar soap storage bins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P030 - Bar Soap Interim Storage/Back Bins with fabric filter, IS-2C	OAC rule 3745-31-05(A)(3) (PTI 14-05770)	Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.25 pound per hour and 1.1 tons per year.* Visible particulate emissions shall not exceed 10 percent opacity, as a six-minute average.
	OAC rule 3745-17-07(A)(1)	See terms and conditions A.II.1and A.II.2.
	OAC rule 3745-17-11(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). The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). *The hourly and annual emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping, reporting, or compliance measures are required.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter and compliance with the specified allowable emission rates.

(Authority for term: OAC rules 3745-77-07(A)(1) and OAC rule 3745-31-05(A)

II. Operational Restrictions

1. The permittee shall maintain and operate the fabric filter (IS-2C) according to the manufacturer's specifications.

(Authority for term: OAC rule 3745-77-07(A)(1))

2. The pressure drop across the fabric filter (IS-2C) shall be maintained within the range of 1 - 8 inches of water or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

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

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which identifies all periods of time during which the pressure drop across the fabric filter (IS-2C) did not comply with the allowable range specified in term and condition A.II.2.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The deviation reports required in term and condition A.IV.1shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emissions limitation(s) specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitations:
Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.25 pound per hour and 1.1 tons per year from the fabric filter stack associated with this emissions unit.

Applicable Compliance Method:
Compliance with the PE limit stated in A.I.1shall be demonstrated by multiplying the uncontrolled emission rate of 250 lbs/hr times the baghouse control efficiency of 99.9%.

250 lbs of PE/hr x (1-0.999) = 0.25 lb of PE/hr.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

It shall be assumed that all PE is PM10.

(Authority for term: OAC rule 3745-77-07(C)1))

1.b Emission Limitation:
Visible PE shall not exceed 10% opacity, as a six minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

(Authority for term: OAC rule 3745-77-07(C)1))

2. Compliance with the operational restriction in term and condition A.II.2 shall be determined by the record keeping required in term and condition A.III.1.

(Authority for term: OAC rule 3745-77-07(C)1))

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P030 - Bar Soap Interim Storage/Back Bins with fabric filter, IS-2C		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ivory Bar Soap Making and Packing, IS-19 (P055)

Activity Description: Bar soap production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P055 - Ivory Bar Soap Making and Packing equipped with fabric filters IS-19b and IS-19c	OAC rule 3745-31-05(A)(3) (PTI 14-3596)	Particulate emissions (PE) and particulate matter less than 10 microns in diameter (PM 10) shall not exceed 0.015 lb per hour*. Organic compound (OC) emissions shall not exceed per 1.34 lbs per hour* and 32.4 lbs per day*. * The hourly and daily emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly, or daily, record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified in OAC rule 3745-17-11(B) is less stringent than that established in PTI 14-3596 under OAC rule 3745-31-05.
	OAC rule 3745-21-07(G)	The emission limitation specified in OAC rule 3745-21-07(G) is less stringent than that established in PTI 14-3596 under OAC rule 3745-31-05.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The emissions from P055 shall be vented to fabric filters IS-19b and IS-19c at all times.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05)

2. The pressure drop across baghouses IS-19 b and IS-19c shall be maintained within the range of 1 - 5 inches of water while the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across baghouses IS-19b and IS-19c while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03596, issued on 12/7/94: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across baghousses IS-19b and IS-19c did not comply with the allowable range specified in A.II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05)

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03596, issued on 12/7/94: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
Particulate emissions (PE) and particulate matter less than 10 microns in diameter (PM 10) shall not exceed 0.015 lb per hour.

Applicable Compliance Method:
Compliance with the hourly PE limit stated in A.I.1 shall be demonstrated by multiplying the uncontrolled emission rate of 7.5 lbs/hr times the baghouse control efficiency, 99.8%.

7.5 lbs of PE/hr x (1-0.998) = 0.015 lb of PE/hr.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05)

1.b Emission Limitations:
Organic compound (OC) emissions shall not exceed 1.34 lbs per hour and 32.4 lbs per day.

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be determined by multiplying the maximum production rate, 39,720 lbs/hr, by the emission factor, 0.034 lb/1000 lbs of soap produced. The 0.034 lb/1000 lbs of soap produced is based on information submitted with PTI application # 14-3596.

Compliance with the daily OC emission limitation shall be determined by multiplying the hourly OC emission limitation by 24 hours per day.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Method 25 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05)

1.c Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03596, issued on 12/7/94: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P055 - Ivory Bar Soap Making and Packing with fabric filters, IS-19b and IS-19c		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Milled Bar Soap Drying System No. 1, IS-21 (P104)

Activity Description: Soap drying

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P104 - Milled Bar Soap Drying System No. 1, equipped with thermal oxidizer IS-26a and wet scrubber, IS-26, as backup	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.0087 lb per hour* and 0.035 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.0071 lb per hour* and 0.029 ton per year* (TPY). Organic compound (OC) emissions shall not exceed 0.63 lb per hour from the oxidizer or 1.95 lbs per hour from the scrubber and 4.23 tons per year (TPY). Sulfur dioxide (SO2) emissions shall not exceed 0.001 lb per hour* and 0.0048 ton per year* (TPY). Carbon monoxide (CO) emissions shall not exceed 0.16 lb pound per hour* and 0.68 ton* per year (TPY). Nitrogen oxide (NOx) shall not exceed 0.25 lb per hour* and 1.11 tons* per year (TPY). *The hourly and TPY emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer, that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Hamilton County Department of Environmental Services of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal oxidizer when this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record following information for each day:

a. All 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit and thermal oxidizer was in operation, was below the temperature limitation in term A.II.3.

b. The hours of operation for the scrubber.

c. A log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3-hour blocks of time during which the average temperature of the thermal oxidizer does not comply with the temperature limitation specified above.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.0087 lb per hour* and 0.035 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.0071 lb per hour* and 0.029 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM 10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates) and by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.d Emission Limitations:
Organic compound (OC) emissions shall not exceed 0.63 lb per hour from the oxidizer or 1.95 lbs per hour from the scrubber and 4.23 tons per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 6535 hrs/yr.

Compliance with the hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor, 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 2225 hr/yr [identified in term A.II.2]

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Emission Limitations:
Sulfur dioxide (SO2) emissions shall not exceed 0.001 lb per hour* and
0.0048 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.f Emission Limitations:
Carbon monoxide (CO) emissions shall not exceed 0.16 lb per hour* and 0.68 ton* per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.g Emission Limitations:

Nitrogen oxide (NOx) shall not exceed 0.25 lb per hour* and
1.11 tons* per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 nitrogen oxide emission factor for natural gas (100 lbs of nitrogen oxide/mmcf) from Section 1.4, Table 1.4-1, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.h Operational Restriction Limitation:
The maximum annual operating hours for the scrubber shall not exceed 2225 hours.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.i Operational Restriction Limitation:
The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P104 - Milled Bar Soap Drying System No. 1, equipped with thermal oxidizer IS-26a and wet scrubber, IS-26, as backup		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Milled Bar Soap Drying System No. 2, IS-21 (P105)

Activity Description: Soap drying

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P105 - Milled Bar Soap Drying System No. 2, equipped with thermal oxidizer IS-26a and wet scrubber, IS-26 as backup	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.0087 lb per hour* and 0.035 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.0071 lb per hour* and 0.029 ton per year* (TPY). Organic compound (OC) emissions shall not exceed 0.63 lb per hour from the oxidizer or 1.95 lbs per hour from the scrubber and 4.23 tons per year (TPY). Sulfur dioxide (SO2) emissions shall not exceed 0.001 lb per hour* and 0.0048 ton per year* (TPY). Carbon monoxide (CO) emissions shall not exceed 0.16 lb pound per hour* and 0.68 ton* per year (TPY). Nitrogen oxide (NOx) shall not exceed 0.25 lb per hour* and 1.11 tons* per year (TPY).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		*The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer, that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Hamilton County Department of Environmental Services of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal oxidizer when this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record following information for each day:

a. All 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit and thermal oxidizer was in operation, was below the temperature limitation in term A.II.3.

b. The hours of operation for the scrubber.

c. A log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3-hour blocks of time during which the average temperature of the thermal oxidizer does not comply with the temperature limitation specified above.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions less than 10 microns emissions from emissions units P104 - P107 and P126 - P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.0087 lb per hour* and 0.035 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.0071 lb per hour* and 0.029 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates) and by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.d Emission Limitations:
Organic compound (OC) emissions shall not exceed 0.63 lb per hour from the oxidizer or 1.95 lbs per hour from the scrubber and 4.23 tons per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 6535 hrs/yr.

Compliance with the hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 8500 lbs/hr, by the emission factor, 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 2225 hrs/yr [identified in term A.II.2]

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Emission Limitations:
Sulfur dioxide (SO2) emissions shall not exceed 0.001 lb per hour* and 0.0048 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.f Emission Limitations:
Carbon monoxide (CO) emissions shall not exceed 0.16 lb per hour* and 0.68 ton* per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.g Emission Limitations:
Nitrogen oxide (NOx) emissions shall not exceed 0.25 lb per hour* and 1.11 tons* per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 nitrogen oxide emission factor for natural gas (100 lbs of nitrogen oxide/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.h Operational Restriction Limitation:
The maximum annual operating hours for the scrubber shall not exceed 2225 hours.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.i Operational Restriction Limitation:
The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P105 - Milled Bar Soap Drying System No. 2, IS-21		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Milled Bar Soap Drying System No. 3, IS-21 (P106)

Activity Description: Soap drying

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P106 - Milled Bar Soap Drying System No. 3, equipped with thermal oxidizer IS-26a and wet scrubber, IS-22a, as backup	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.011lb per hour* and 0.045 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.009 lb per hour* and 0.037 ton per year* (TPY). Organic compound (OC) emissions shall not exceed 0.82 lb per hour from the oxidizer or 2.52 lbs per hour from the scrubber and 5.47 tons per year (TPY). Sulfur dioxide (SO2) emissions shall not exceed 0.0014 lb per hour* and 0.0062 ton per year* (TPY). Carbon monoxide (CO) emissions shall not exceed 0.20 lb pound per hour* and 0.88 ton* per year (TPY). Nitrogen oxide (NOx) shall not exceed 0.33 lb per hour* and 1.44 tons* per year (TPY).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		*The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer, that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Hamilton County Department of Environmental Services of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal oxidizer when this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record following information for each day:

a. All 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit and thermal oxidizer was in operation, was below the temperature limitation in term A.II.3.

b. The hours of operation for the scrubber.

c. A log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3 hour blocks of time during which the average temperature of the thermal oxidizer does not comply with the temperature limitation specified above.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.011 lb per hour* and 0.045 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.009 lb per hour* and 0.037 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 8500/39000 (prorated between P104-P107 according to production rates) and by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.d Emission Limitations:
Organic compound (OC) emissions shall not exceed 0.82 lb per hour from the oxidizer or 2.52 lbs per hour from the scrubber and 5.47 tons per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 6535 hrs/yr.

Compliance with the hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor, 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 2225 hrs/yr [identified in term A.II.2]

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Emission Limitations:
Sulfur dioxide (SO2) emissions shall not exceed 0.0014 lb per hour* and 0.0062 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.f Emission Limitations:
Carbon monoxide (CO) emissions shall not exceed 0.20 lb pound per hour* and 0.88 ton* per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.g Emission Limitations:
Nitrogen oxide (NOx) emissions shall not exceed 0.33 lb per hour* and 1.44 tons* per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 nitrogen oxide emission factor for natural gas (100 lbs of nitrogen oxide/mmcf) from Section 1.4, Table 1.4-1, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.h Operational Restriction Limitation:
The maximum annual operating hours for the scrubber shall not exceed 2225 hours.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.i Operational Restriction Limitation:
The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P106 - Milled Bar Soap Drying System No. 3, IS-21		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Milled Bar Soap Drying System No. 4, IS-21 (P107)

Activity Description: Soap drying

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P107 - Milled Bar Soap Drying System No. 4, equipped with thermal oxidizer IS-26a and a wet scrubber, IS-22a, as backup	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.011lb per hour* and 0.045 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.009 lb per hour* and 0.037 ton per year* (TPY). Organic compound (OC) emissions shall not exceed 0.82 lb per hour from the oxidizer or 2.52 lbs per hour from the scrubber and 5.47 tons per year (TPY). Sulfur dioxide (SO2) emissions shall not exceed 0.0014 lb per hour* and 0.0062 ton per year* (TPY). Carbon monoxide (CO) emissions shall not exceed 0.20 lb pound per hour* and 0.88 ton* per year (TPY). Nitrogen oxide (NOx) shall not exceed 0.33 lb per hour* and 1.44 tons* per year (TPY).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		*The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a thermal oxidizer system, which consists of a water disengagement system followed by a thermal oxidizer, that controls at least 80% of the organic compound emissions produced by this emissions unit. As a backup to the thermal oxidizer, the permittee shall operate a scrubber that controls at least 80% of the organic compound emissions produced by this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The maximum annual operating hours for the scrubber used to control this emissions unit shall not exceed 2225 hours. The permittee shall inform the Hamilton County Department of Environmental Services of the intent to operate the scrubber system within the next two business days of beginning operation of the scrubber system.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal oxidizer when this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record following information for each day:

a. All 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit and thermal oxidizer was in operation, was below the temperature limitation in term A.II.3.

b. The hours of operation for the scrubber.

c. A log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of any exceedances of the operating hours limitation for the scrubber.

b. An identification of any 3-hour blocks of time during which the average temperature of the thermal oxidizer does not comply with the temperature limitation specified above.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit annual reports which include the following information:

a. The total number of hours the scrubber was in operation.

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rules 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.011lb per hour* and 0.045 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.009 lb per hour* and 0.037 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 filterable particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates) and by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.d Emission Limitations:
Organic compound (OC) emissions shall not exceed 0.82 lb per hour from the oxidizer or 2.52 lbs per hour from the scrubber and 5.47 tons per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation from the oxidizer shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor of 0.074 lb of OC/1000 lbs of soap. The annual emissions from the oxidizer are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 6535 hrs/yr.

Compliance with the hourly OC emission limitation from the scrubber shall be demonstrated by multiplying the maximum hourly production rate, 11000 lbs/hr, by the emission factor, 0.229 lb of OC/1000 lbs of soap. The annual emissions from the scrubber are determined by multiplying the hourly rate by the hours of operation of the ozidizer, 2225 hrs/yr [identified in term A.II.2]

The total annual emissions are determined by adding the annual emissions from the oxidizer and scrubber and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Emission Limitations:
Sulfur dioxide (SO2) emissions shall not exceed 0.0014 lb per hour* and 0.0062 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly SO2 emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4, Table 1.4-2, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.f Emission Limitations:
Carbon monoxide (CO) emissions shall not exceed 0.20 lb pound per hour* and 0.88 ton* per year (TPY).

Applicable Compliance Methods:
Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.g Emission Limitation:
Nitrogen oxide (NOx) emissions shall not exceed 0.33 lb per hour* and 1.44 tons* per year.

Applicable Compliance Method:
Compliance with the hourly NOx emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 nitrogen oxide emission factor for natural gas (100 lbs of nitrogen oxide/mmcf) from Section 1.4, Table 1.4-1, 7/98. This number is then multiplied by 11000/39000 (prorated between P104-P107 according to production rates).

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.h Operational Restriction Limitation:
The maximum annual operating hours for the scrubber shall not exceed 2225 hours.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.i Operational Restriction Limitation:
The average temperature of the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees F.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P107 - Milled Bar Soap Drying System No. 4, equipped with thermal oxidizer IS-26a and a wet scrubber, IS-22a, as backup		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bar Soap Making System #6 (P122)

Activity Description: Bar soap production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P122 - Bar Soap Making System # 6, equipped with bag house, IS-52a	OAC rule 3745-31-05(A)(3) (PTI 14-04960)	Particulate emissions (PE)/ particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.42 lb per hour* and 1.84 tons per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.55 lbs per hour and 37.20 lbs per day* and 6.81 tons per year* (TPY). *The hourly, daily and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall maintain and operate baghouse IS-52a according to the manufacturers' specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the baghouse IS-52a shall be maintained within the range of 1 - 8 inches of water while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the baghouse IS-52a while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturers' recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04960, issued on 7/20/00: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the emission limits stated in term A.I.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across baghouse IS-52a did not comply with the allowable range specified in term A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1))

IV. Reporting Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04960, issued on 7/20/00: A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE)/particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.42 lb per hour* and 1.84 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE/PM10 limitation shall be demonstrated by adding the PE/PM10 emissions from the dye preparation/mixing to the PE/PM10 emissions from the dry soap receivers/surge bins. The PE/PM10 emissions from the dry soap receivers/surge bins is determined by multiplying the maximum uncontrolled emissions of 363.56 lbs/hr by the baghouse control efficiency of 99.9%. The PE/PM10 emissions from the dye preparation/mixing is determined by multiplying the maximum uncontrolled emissions of 5.14 lbs/hr by the baghouse control efficiency of 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:

Organic Compound (OC) emissions shall not exceed 1.55 lbs per hour and 37.20 lbs per day* and 6.81 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by adding the OC emissions from the surge bins to the making system 6. The OC emissions from the surge bins are determined by multiplying the maximum production rate, 9765 lbs/hr, by the emission factor, 0.085 lb/1000 lbs of soap produced. The OC emissions from making system 6 is determined by multplying the maximum production rate, 9765 lbs/hr, by the emission factor, 0.074 lb/1000 lbs of soap produced.

(This emission factor is based on material balance and the permittee's process knowledge.)

The daily emissions are determined by multiplying the total hourly rate by 24 hrs/day.

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Method 25 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Operational Limitation:
The pressure drop across the baghouse (IS-52a) shall be maintained within the range of 1 - 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-04960, issued on 7/20/00: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P122 - Bar Soap Making System # 6, equipped with bag house, IS-52a		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P122) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: confidential

TLV (ug/m3): 5000

Maximum Hourly Emission Rate (lbs/hr): 2.38 (combined total for P122 & P125)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 29.57 for IS-52a
48.56 for IS-1c

MAGLC (ug/m3): 119

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

III. Monitoring and/or Record Keeping Requirements (continued)

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

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

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bar Soap Packing Line E (P125)

Activity Description: Bar soap production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P125 - Bar Soap Packing Line E, equipped with bag house, IS-53	OAC rule 3745-31-05(A)(3) (PTI 14-05755)	Particulate emissions (PE)/ particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.067 lb per hour* and 0.30 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.05 lbs per hour and 25.2 lbs per day* and 4.6 tons per year* (TPY). *The hourly, daily, and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall maintain and operate the baghouse (IS-53) according to the manufacturers' specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the baghouse (IS-53) shall be maintained within the range of 1 - 10 inches of water while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the baghouse (IS-53) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturers' recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05755, issued on 8/30/05: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the emission limits stated in term A.I.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse (IS-53) did not comply with the allowable range specified in term A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1))

IV. Reporting Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05755, issued on 8/30/05: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE)/ particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.067 lb per hour* and 0.30 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE limit stated in A.I.1 shall be demonstrated by multiplying the uncontrolled emission rate of 67.3 lbs/hr times the baghouse control efficiency, 99.9%.

67.3 lbs of PE/hr x (1-0.999) = 0.067 lb of PE/hr.

The PE limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05755 submitted on August 3, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

It shall be assumed that all PE is PM10.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:

Organic Compound (OC) emissions shall not exceed 1.05 lbs per hour and 25.2 lbs per day* and 4.6 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.125 lb of OC/1000 lbs of soap.

This emission factor is based on material balance.

The daily emissions are determined by multiplying the hourly rate by 24 hrs/day.

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Operational Limitation:
The pressure drop across the baghouses (IS-53) shall be maintained within the range of 1 - 10 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05755 issued on 8/30/05: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P125 - Bar Soap Packing Line E, equipped with bag house, IS-53		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P125) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: diethyl phthalate

TLV (ug/m3): 5000

Maximum Hourly Emission Rate (lbs/hr): 1.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.4

MAGLC (ug/m3): 119

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

III. Monitoring and/or Record Keeping Requirements (continued)

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Flake Bin 1/2 (P129)

Activity Description: Flake storage bin

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P129 - Flake Bin 1/2 equiped with fabric filter, IS - 23	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.13 lb per hour* and 0.55 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.11lb per hour* and 0.45 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.013 lb per hour* and 0.057 ton per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. See A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(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).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a fabric filter that controls at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter (IS-23) shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter (IS-23) while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filter on a weekly basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.13 lb per hour* and 0.55 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum uncontrolled emission rate, 125 lbs/hr, by the baghouse control efficiency of 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.11 lb per hour* and 0.45 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum uncontrolled emission rate, 125 lbs/hr, by the baghouse control efficiency of 99.9% and by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 0.013 lb per hour* and 0.057 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the emission factor of 0.001 lb of OC/1000 lbs of soap produced by the production rate of 13000 lbs/hr.

The total annual emissions are determined by multiplying the hourly rate by 8760 and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P129 - Flake Bin 1/2 equiped with fabric filter, IS - 23		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bar Soap Making System #1 (P130)

Activity Description: Milled Bar Soap Production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P130 - Bar Soap Making System #1 equipped with fabric filters IS-1C, IS-24b, and IS-24c	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 1.91 lbs per hour* and 8.36 tons per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 1.56 lbs per hour* and 6.84 tons per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.01 lbs per hour* and 4.40 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate fabric filters IS-1C, IS-24b, and IS-24c that control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The permittee shall maintain and operate the fabric filters according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filters for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filters for this emissions unit on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filters did not comply with the allowable range specified in term A.II.3.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 1.91 lbs per hour* and 8.36 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum uncontrolled hourly emissions, 128 lbs per hour, by the fabric filter control efficiency, 99.9%.

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitation:
Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 1.56 lbs per hour* and 6.84 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum uncontrolled hourly emissions, 128 lbs per hour, by the fabric filter control efficiency, 99.9%. These emissions are multiplied by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 1.01 lbs per hour* and 4.40 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.120 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P130 - Bar Soap Making System #1 equipped with fabric filters IS-1C, IS-24b, and IS-24c		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bar Soap Making System #2 (P131)

Activity Description: Milled Bar Soap Production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P131 - Bar Soap Making System #2 equipped with fabric filters IS-1C and IS-24b	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 1.91 lbs per hour* and 8.36 tons per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 1.56 lbs per hour* and 6.84 tons per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.01 lbs per hour* and 4.40 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate fabric filters that control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The permittee shall maintain and operate the fabric filters according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filters for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filters for this emissions unit on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filters did not comply with the allowable range specified in term A.II.3.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 1.91 lbs per hour* and 8.36 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multiplying the maximum uncontrolled hourly emissions, 128 lbs per hour, by the fabric filter control efficiency, 99.9%.

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitation:
Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 1.56 lbs per hour* and 6.84 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multiplying the maximum uncontrolled hourly emissions, 128 lbs per hour, by the fabric filter control efficiency, 99.9%. These emissions are multiplied by 0.815 (PM10 is assumed to be 81.5% of PM).

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 1.01 lbs per hour* and 4.40 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.120 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P131 - Bar Soap Making System #2 equipped with fabric filters IS-1C and IS-24b		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bar Soap Making System #3 (P132)

Activity Description: Milled Bar Soap Production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P132 - Bar Soap Making System #3 equipped with fabric filter IS-27	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.24 lb per hour* and 1.0 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.2 lb per hour* and 0.82 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.8 lb per hour* and 3.50 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a fabric filter that controls at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The permittee shall maintain and operate the fabric filter according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filter for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filter for this emissions unit on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.3.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.24 lb per hour* and 1.0 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 240 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:

Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.2 lb per hour* and 0.82 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 240 lbs/hr, but the baghouse control efficiency, 99.9% These emissions are multiplied by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 0.8 lb per hour* and 3.50 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P132 - Bar Soap Making System #3 equipped with fabric filter IS-27		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bar Soap Making System #4 (P133)

Activity Description: Milled Bar Soap Production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P133 - Bar Soap Making System #4 equipped with fabric filter IS-28	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.30 lb per hour* and 1.26 tons per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.25 lb per hour* and 1.03 tons per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate fabric filters that control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The permittee shall maintain and operate fabric filter according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filter for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filters for this emissions unit on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.3.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.30 lb per hour* and 1.26 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 286 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.25 lb per hour* and 1.03 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 286 lbs/hr, by the baghouse control efficiency, 99.9% These emissions are multiplied by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P133 - Bar Soap Making System #4 equipped with fabric filter IS-28		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Packing Line A (P135)

Activity Description: Milled Bar Soap Packing Line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P135 - Packing Line A equipped with fabric filter IS-27	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(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).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a fabric filter that controls at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filter for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filter for this emissions unit on a weekly basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 82 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multplying the maximum hourly PM emissions rate of 0.9 lbs/hr, by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitation:
Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY).

Applicable Compliance Method:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P135 - Packing Line A equipped with fabric filter IS-27		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Packing Line B (P136)

Activity Description: Milled Bar Soap Packing Line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P136 - Packing Line B equipped with fabric filters IS-52a and IS-28	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.1 lb per hour* and 0.44 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.74 lb per hour* and 0.30 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.05 lbs per hour* and 4.6 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate fabric filters that control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filters for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filters for this emissions unit on a weekly basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filters did not comply with the allowable range specified in term A.II.2..

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.1 lb per hour* and 0.44 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 82 lbs/hr, by the baghouse control efficiency, 99.9%. The number was then rounded to the nearest tenth.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.74 lb per hour* and 0.30 ton per year* (TPY).

Applicable Compliance Method:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 82 lbs/hr, by the baghouse control efficiency, 99.9% and by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 1.05 lbs per hour* and 4.6 tons per year* (TPY).

Applicable Compliance Method:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P136 - Packing Line B equipped with fabric filters IS-52a and IS-28		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Packing Line C (P137)

Activity Description: Milled Bar Soap Packing Line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P137 - Packing Line C equipped with fabric filter IS-24b	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a fabric filter that controls at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filter for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filter for this emissions unit on a weekly basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.09 lb per hour* and 0.37 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 90 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:

Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.074 lb per hour* and 0.30 ton per year* (TPY).

Applicable Compliance Method:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 90 lbs/hr, by the baghouse control efficiency, 99.9% and by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.).

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P137 - Packing Line C equipped with fabric filter IS-24b		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Packing Line D (P138)

Activity Description: Milled Bar Soap Packing Line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P138 - Packing Line D equipped with fabric filter IS-24b	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate a fabric filter that controls at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filter for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filter for this emissions unit on a weekly basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 80 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:
Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 80 lbs/hr, by the baghouse control efficiency, 99.9% and by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across the fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P138 - Packing Line D equipped with fabric filter IS-24b		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Packing Line F (P139)

Activity Description: Milled Bar Soap Packing Line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P139 - Packing Line F equipped with fabric filters IS-28, IS-24b, and IS-52a	OAC rule 3745-31-05(A)(3) (PTI 14-03870)	Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY). Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY). Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate fabric filters that control at least 99.9% of the particulate matter emissions produced in this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation .

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the fabric filters for this emissions unit while it is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the fabric filters for this emissions unit on a weekly basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filters did not comply with the allowable range specified in term A.II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following information:

a. A summary of all exceedances reported during the year; and

b. The total OC, particulate emissions and particulate emissions less than 10 microns from emissions units P104 - P107 and P126 - P139 for the calendar year.

The annual reports shall be submitted by January 31 of each year and shall cover the previous calender year.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE) shall not exceed 0.08 lb per hour* and 0.32 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 80 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:

Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.065 lb per hour* and 0.26 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 80 lbs/hr, by the baghouse control efficiency, 99.9% and by 0.815 (PM10 is assumed to be 81.5% of PM).

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-4, 201 and 202 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Emission Limitations:
Organic Compound (OC) emissions shall not exceed 0.80 lb per hour* and 3.50 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.095 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.e Operational Limitation:
The pressure drop across each fabric filter shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-03870, issued on 9/26/02: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P139 - Packing Line F equipped with fabric filters IS-28, IS-24b, and IS-52a		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Milled Bar Soap Making System #5 (P145)

Activity Description: Milled Bar Soap Making

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P145 - Milled Bar Soap Making System #5 equipped with fabric filters IS-52b, IS-53, and IS-28.	OAC rule 3745-31-05(A)(3) (PTI 14-04997)	Particulate emissions (PE)/ Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.35 lb per hour* and 1.52 tons per year* (TPY). Organic Compound (OC) emissions shall not exceed 1.05 lbs per hour* and 25.2 lbs per day* and 4.6 tons per year* (TPY). *The hourly, daily, and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall maintain and operate fabric filters IS-52b, IS-53, and IS-28 according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across fabric filters IS-52b, IS-53, and IS-28 shall be maintained within the following ranges while the emissions unit is in operation:

For IS-52b: 1-5 inches of water;
For IS-53: 1-10 inches of water; and
For IS-28: 1-8 inches of water.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across fabric filters IS-52b, IS-53, and IS-28 while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturers' recommendations, instructions, and operating manuals(s). The permittee shall record the pressure drop across each baghouse on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04997, issued on 8/25/05: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the emission limits stated in term A.I.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across fabric filters IS-52b, IS-53, and IS-28 did not comply with the allowable range specified in term A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04997, issued on 8/25/05: A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE)/ Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.35 lb per hour* and 1.52 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE/PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 346 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.c Emission Limitations:
Organic Compound (OC) emissions shall not exceed 1.05 lbs per hour* and 25.2 lbs per day* and 4.6 tons per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 8400 lbs/hr, by the emission factor of 0.125 lb of OC/1000 lbs of soap.

(This emission factor is based on material balance and the permittee's process knowledge.)

The daily emissions are determined by multiplying the hourly rate by 24 hrs/day.

The annual emissions are determined by multiplying the hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.d Operational Limitation:
Pressure drop ranges:

For IS-52b: 1-5 inches of water;
For IS-53: 1-10 inches of water; and
For IS-28: 1-8 inches of water.

Applicable Compliance Method:
Compliance with the operational limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-04997, issued on 8/25/05: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P145 - Milled Bar Soap Making System #5 equipped with fabric filters IS-52b, IS-53, and IS-28.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P145) was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: diethyl phthalate

TLV (ug/m3): 5000

Maximum Hourly Emission Rate (lbs/hr): 1.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.4

MAGLC (ug/m3): 119

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

III. Monitoring and/or Record Keeping Requirements (continued)

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bulk Dry Majors Storage Silo, IS-25d (P150)

Activity Description: Dry material storage silo

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P150 - Bulk Dry Majors Storage Silo, equipped with fabric filter IS-25d	OAC rule 3745-31-05(A)(3) (PTI 14-05194)	Particulate emissions (PE)/ Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.06 lb per hour* and 0.26 ton per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The emissions from P150 shall be vented to fabric filter IS-25d during all times the emission unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform quarterly inspections of the fabric filter controlling this emissions unit. At a minimum, these quarterly inspections shall include the following:

a. a visual leak check of the duct work leading to the cartridge filter to ensure no leaks are occurring;

b. a visual inspection of the fabric filter to look for holes, punctures perforations or any other indication of problems leading to the filter not functioning properly; and

c. a check of any visible emissions exiting the cartridge filter.

The permittee shall collect and record the results of this inspection in a log book. If any problems are noted during the quarterly inspection, the measures taken to correct the problem shall be noted.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. 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 cartridge filter 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 location and color of the emissions;
b. the total duration of any visible emission incident; and
c. any corrective actions taken to eliminate the visible emissions.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all quarters the inspection of the cartridge filter required in A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit semiannual written reports that (a) indentify all days during which any visible particulate emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE)/Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.06 lb per hour* and 0.26 ton per year* (TPY).

Applicable Compliance Method:
Compliance with the hourly PE/PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 60 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P150 - Bulk Dry Majors Storage Silo, equipped with fabric filter IS-25d		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bulk Dry Majors Use Bin 1/2, IS-25e (P151)

Activity Description: Dry material use bin

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P151 - Bulk Dry Majors Use Bin 1/2, equipped with fabric filter IS-25e	OAC rule 3745-31-05(A)(3) (PTI 14-05194)	Particulate emissions (PE)/ Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.004 lb per hour* and 0.018 ton per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The emissions from P151 shall be vented to fabric filter IS-25e during all times the emission unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform quarterly inspections of the fabric filter controlling this emissions unit. At a minimum, these quarterly inspections shall include the following:

a. a visual leak check of the duct work leading to the cartridge filter to ensure no leaks are occurring;

b. a visual inspection of the fabric filter to look for holes, punctures perforations or any other indication of problems leading to the filter not functioning properly; and

c. a check of any visible emissions exiting the cartridge filter.

The permittee shall collect and record the results of this inspection in a log book. If any problems are noted during the quarterly inspection, the measures taken to correct the problem shall be noted.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. 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 cartridge filter 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 location and color of the emissions;
b. the total duration of any visible emission incident; and
c. any corrective actions taken to eliminate the visible emissions.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all quarters the inspection of the cartridge filter required in A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit semiannual written reports that (a) indentify all days during which any visible particulate emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE)/Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.004 lb per hour* and 0.018 ton per year* (TPY).

Applicable Compliance Method:
Compliance with the hourly PE/PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 4 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P151 - Bulk Dry Majors Use Bin 1/2, equipped with fabric filter IS-25e		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bulk Dry Majors Use Bin 3/4, IS-25f (P152)

Activity Description: Dry material use bin

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P152 - Bulk Dry Majors Use Bin 3/4 equipped with fabric filter IS-25f	OAC rule 3745-31-05(A)(3) (PTI 14-05194)	Particulate emissions (PE)/ Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.007 lb per hour* and 0.031ton per year* (TPY). *The hourly and ton/yr emission limitations outlined above are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11(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).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The emissions from P152 shall be vented to fabric filter IS-25f during all times the emission unit is in operation

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform quarterly inspections of the fabric filter controlling this emissions unit. At a minimum, these quarterly inspections shall include the following:

a. a visual leak check of the duct work leading to the cartridge filter to ensure no leaks are occurring;

b. a visual inspection of the fabric filter to look for holes, punctures perforations or any other indication of problems leading to the filter not functioning properly; and

c. a check of any visible emissions exiting the cartridge filter.

The permittee shall collect and record the results of this inspection in a log book. If any problems are noted during the quarterly inspection, the measures taken to correct the problem shall be noted.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. 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 cartridge filter 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 location and color of the emissions;
b. the total duration of any visible emission incident; and
c. any corrective actions taken to eliminate the visible emissions.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall submit semiannual written reports that (a) indentify all days during which any visible particulate emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

(Authority for term: OAC rules 3745-77-07(C)(1))

IV. Reporting Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.IV.1 - A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

1.a Emission Limitation:
The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six minute average, except as specified by rule.

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

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitations:
Particulate emissions (PE)/Particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 0.007 lb per hour* and 0.031 ton per year* (TPY).

Applicable Compliance Methods:
Compliance with the hourly PE/PM10 emission limitation shall be demonstrated by multplying the maximum uncontrolled hourly emissions, 7 lbs/hr, by the baghouse control efficiency, 99.9%.

(This emission factor is based on material balance and the permittee's process knowledge.)

The annual emissions are determined by multiplying the total hourly rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, compliance with the lb/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05194, issued on 8/16/01: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P152 - Bulk Dry Majors Use Bin 3/4 equipped with fabric filter IS-25f		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vacuum Dryer No. 2, IS-54 (P153)

Activity Description: Vacuum dryer for soap

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P153 - Vacuum Dryer Number 2 with wet scrubber and condenser	OAC rule 3745-31-05(A)(3) (PTI 14-05770)	Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year.* See terms and conditions A.II.1 through A.II.3.
	OAC rule 3745-21-07(G)(9)(f)	This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G). See term and condition A.I.2.b. *The hourly and annual emissions limitations are based on the emissions unit's potential to emit. Therefore, no record keeping, reporting, or compliance measures are required.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a wet scrubber, condenser and compliance with the specified allowable emission rates.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. Additional Terms and Conditions (continued)

2.b This emissions unit currently employs non-photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

Prior to employing any photochemically reactive material in this emissions unit, including any cleanup material that is a photochemically reactive material, the permittee shall provide written notification to the Hamilton County Department of Environmental Services. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

II. Operational Restrictions

1. The permittee shall maintain and operate the wet scrubber and condenser according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The average scrubber flow rate, for any 3-hour block of time, shall be maintained at or above 25 gallons per minute or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 100 degrees Fahrenheit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the scrubber liquor flow rate while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the scrubber liquor flow rate on an hourly basis. The 3-hour rolling average for the hourly pressure drops recorded above shall also be recorded.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

The permittee shall collect and record each day the average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day while this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month:

a. The company identification of each solvent employed in this emissions unit; and

b. A record for each solvent employed, indicating whether or not the solvent is a photochemically reactive material.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

a. The scrubber liquor flow rate.

Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 11/15/05: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in A.II.3.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Unless otherwise specified, the deviation reports required in these terms and conditions shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

IV. Reporting Requirements (continued)

5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

Emission Limitations:

Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year.

Applicable Compliance Method:

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.a Emissions Limitations:

Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year.

Applicable Compliance Method:

The OC emissions limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emissions limitation was developed by multiplying the hourly OC emissions limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Compliance with the operational restriction in term and condition A.II.2 shall be determined by the record keeping required in term and condition A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Compliance with the operational restriction in term and condition A.II.3 shall be determined by the record keeping required in term and condition A.III.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

4. Compliance with the operational restriction in term and condition A.I.2.b shall be determined by the record keeping required in term and condition A.III.3.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P153 - Vacuum Dryer Number 2		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vacuum Dryer No. 3, IS-55 (P154)

Activity Description: Vacuum dryer for soap

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P154 - Vacuum Dryer Number 3	OAC rule 3745-31-05(A)(3) (PTI 14-05770)	Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year.* See terms and conditions A.II.1 through A.II.3.
	OAC rule 3745-21-07(G)(9)(f)	This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G). See term and condition A.I.2.b. *The hourly and annual emissions limitations are based on the emissions unit's potential to emit. Therefore, no record keeping, reporting, or compliance measures are required.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a wet scrubber, condenser and compliance with the specified allowable emission rates.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2.b This emissions unit currently employs non-photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

Prior to employing any photochemically reactive material in this emissions unit, including any cleanup material that is a photochemically reactive material, the permittee shall provide written notification to the Hamilton County Department of Environmental Services. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

II. Operational Restrictions

1. The permittee shall maintain and operate the wet scrubber and condenser according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The average scrubber flow rate, for any 3-hour block of time, shall be maintained at or above 25 gallons per minute or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

3. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 100 degrees Fahrenheit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the scrubber liquor flow rate while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the scrubber liquor flow rate on an hourly basis. The 3-hour rolling average for the hourly pressure drops recorded above shall also be recorded.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day the average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day while this emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The permittee shall collect and record the following information each month:

a. The company identification of each solvent employed in this emissions unit; and

b. A record for each solvent employed, indicating whether or not the solvent is a photochemically reactive material.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

a. The scrubber liquor flow rate.

Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 11/15/05: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in A.II.3.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Unless otherwise specified, the deviation reports required in these terms and conditions shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.IV.1 - A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

1. Compliance with the emissions limitation(s) specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitations:

Organic compound (OC) emissions shall not exceed 0.08 pound per hour and 0.37 ton per year.

Applicable Compliance Method:

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

2. Compliance with the operational restriction in term and condition A.II.2 shall be determined by the record keeping required in term and condition A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Compliance with the operational restriction in term and condition A.II.3 shall be determined by the record keeping required in term and condition A.III.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Compliance with the operational restriction in term and condition A.I.2.b shall be determined by the record keeping required in term and condition A.III.3.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P154 - Vacuum Dryer Number 3		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Minor Additions Systems 1 and 2, IS-56 (P155)

Activity Description: Dry material use bins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P155 - Minor Additions Systems 1 and 2	OAC rule 3745-31-05(A)(3) (PTI 14-05770)	Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.17 pound per hour and 0.75 ton per year.* Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average. See terms and conditions A.II.1 and A.II.2.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(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). *The hourly and annual emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping, reporting, or compliance measures are required.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter and compliance with the specified allowable emission rates.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

II. Operational Restrictions

1. The permittee shall maintain and operate the fabric filter (IS-56) according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter (IS-56) shall be maintained within the range of 1 - 10 inches of water or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter (IS-56) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which identifies all periods of time during which the pressure drop across the fabric filter (IS-56) did not comply with the allowable range specified in term and condition A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The deviation reports required in term and condition A.IV.1. shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

1. Compliance with the emission limitation(s) specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate Emissions (PE) and Particulate Matter 10 microns and less (PM10) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE limit stated in A.I.1 shall be demonstrated by multiplying the uncontrolled emission rate of 171.4 lbs/hr times the baghouse control efficiency, 99.9%.

171.4 lbs of PE/hr x (1-0.999) = 0.17 lb of PE/hr.

The PE limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.b The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

It shall be assumed that all PE is PM10.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitation:

Visible particulate emissions shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Compliance with the operational restriction in term and condition A.II.2 shall be determined by the record keeping required in term and condition A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P155 - Minor Additions System 1		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Making/Packing Line 7-G, IS-57 (P156)

Activity Description: Bar soap production and packing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P156 - Making/Packing Line 7-G	OAC rule 3745-31-05(A)(3) (PTI 14-05770)	Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.18 pound per hour and 0.77 ton per year.* Organic compound (OC) emissions shall not exceed 2.75 pounds per hour, and 12.05 tons per year.* Visible particulate emissions shall not exceed 10 percent opacity, as a six-minute average. See terms and conditions A.II.1 and A.II.2.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)(9)(f)	This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G). See term and condition A.2.b. *The hourly and annual emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping, reporting, or compliance measures are required.

2. Additional Terms and Conditions

1. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter and compliance with the specified allowable emission rates.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. This emissions unit currently employs non-photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

Prior to employing any photochemically reactive material in this emissions unit the permittee shall provide written notification to the Hamilton County Department of Environmental Services. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

II. Operational Restrictions

1. The permittee shall maintain and operate the fabric filter (IS-57) according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter (IS-57) shall be maintained within the range of 1 - 10 inches of water or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter (IS-57) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month:

a. The company identification of each solvent employed in this emissions unit; and

b. A record for each solvent employed, indicating whether or not the solvent is a photochemically reactive material.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.III.1and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which identifies all periods of time during which the pressure drop across the fabric filter (IS-57) did not comply with the allowable range specified in term and condition A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The deviation reports required in term and condition A.IV.1 shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.IV.1 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

1. Compliance with the emission limitation(s) specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions (PE) and particulate matter 10 microns and less (PM10) emissions shall not exceed 0.18 pound per hour and 0.77 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE limitation stated in A.I.1 shall be demonstrated by multiplying the uncontrolled emission rate of 176 lbs/hr times the baghouse control efficiency, 99.9%.

176 lbs of PE/hr x (1-0.999) = 0.18 lb of PE/hr.

The PE limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

It shall be assumed that all PE is PM10.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.b Emission Limitations:

Organic compound (OC) emissions shall not exceed 2.75 pounds per hour and 12.05 tons per year.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 11,000 lbs/hr, by the emission factor of 0.250 lb of OC/1000 lbs of soap.

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitation:

Visible particulate emissions shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

2. Compliance with the operational restriction in term and condition A.II.2 shall be determined by the record keeping required in term and condition A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Compliance with term and condition A.I.2.b shall be determined by the record keeping required in term and condition A.III.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P156 - Making/Packing Line 7-G		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P156, P157 and P158 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Benzyl Acetate

TLV (ug/m3): 61,423

Maximum Hourly Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 441
MAGLC (ug/m3): 1462 ug/m3

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Making/Packing Line 8-H, IS-58 (P157)

Activity Description: Bar soap production and packing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P157 - Making/Packing Line 8-H	OAC rule 3745-31-05(A)(3) (PTI 14-05770)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.18 pound per hour and 0.77 ton per year.* Organic compound (OC) emissions shall not exceed 2.75 pounds per hour and 12.05 tons per year.* Visible particulate emissions shall not exceed 10 percent opacity, as a six-minute average. See terms and conditions A.II.1 and A.II.2.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(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).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G). See term and condition A.2.b. *The hourly and annual emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping, reporting, or compliance measures are required.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter and compliance with the specified allowable emission rates.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2.b This emissions unit currently employs non-photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

Prior to employing any photochemically reactive material in this emissions unit the permittee shall provide written notification to the Hamilton County Department of Environmental Services. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

II. Operational Restrictions

1. The permittee shall maintain and operate the fabric filter (IS-58) according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter (IS-58) shall be maintained within the range of 1 - 10 inches of water or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter (IS-58) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month:

a. The company identification of each solvent employed in this emissions unit; and

b. A record for each solvent employed, indicating whether or not the solvent is a photochemically reactive material.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.III.1and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which identifies all periods of time during which the pressure drop across the fabric filter (IS-58) did not comply with the allowable range specified in term and condition A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The deviation reports required in term and condition A.IV.1. shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.IV.1 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

1. Compliance with the emission limitation(s) specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions (PE) and particulate matter 10 microns and less (PM10) emissions shall not exceed 0.18 pound per hour and 0.77 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE limit stated in A.I.1 shall be demonstrated by multiplying the uncontrolled emission rate of 176 lbs/hr times the baghouse control efficiency, 99.9%.

176 lbs of PE/hr x (1-0.999) = 0.18 lb of PE/hr.

The PE limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

It shall be assumed that all PE is PM10.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.b Emission Limitations:

Organic compound (OC) emissions shall not exceed 2.75 pounds per hour and 12.05 tons per year.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 11,000 lbs/hr, by the emission factor of 0.250 lb of OC/1000 lbs of soap.

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

Emissions Limitation:

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitation:

Visible particulate emissions shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

2. Compliance with the operational restriction in term and condition A.II.2 shall be determined by the record keeping required in term and condition A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Compliance with term and condition A.I.2.b shall be determined by the record keeping required in term and condition A.III.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P157 - Making/Packing Line 8-H		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P156, P157 and P158 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Benzyl Acetate

TLV (ug/m3): 61,423

Maximum Hourly Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 441

MAGLC (ug/m3): 1462 ug/m3

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Making/Packing Line 9-I, IS-59 (P158)

Activity Description: Bar soap production and packing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P158 - Making/Packing Line 9-I	OAC rule 3745-31-05(A)(3) (PTI 14-05770)	Particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.11 pound per hour and 0.48 ton per year.* Organic compound (OC) emissions shall not exceed 1.75 pounds per hour and 7.67 tons per year.* Visible particulate emissions shall not exceed 10 percent opacity, as a six-minute average. See terms and conditions A.II.1 and A.II.2.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(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).
	OAC rule 3745-21-07(G)	This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G). See term and condition A.2.b. *The hourly and annual emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping, reporting, or compliance measures are required.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter and compliance with the specified allowable emission rates.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

2.b This emissions unit currently employs non-photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

Prior to employing any photochemically reactive material in this emissions unit the permittee shall provide written notification to the Hamilton County Department of Environmental Services. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A))

II. Operational Restrictions

1. The permittee shall maintain and operate the fabric filter (IS-59) according to the manufacturer's specifications.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The pressure drop across the fabric filter (IS-59) shall be maintained within the range of 1 - 10 inches of water or as specified as the normal operating range by the manufacturer, whichever is more stringent, while the emissions unit is in operation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter (IS-59) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The permittee shall collect and record the following information each month:

a. The company identification of each solvent employed in this emissions unit; and

b. A record for each solvent employed, indicating whether or not the solvent is a photochemically reactive material.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.III.1and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which identifies all periods of time during which the pressure drop across the fabric filter (IS-59) did not comply with the allowable range specified in term and condition A.II.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. The deviation reports required in term and condition A.IV.1 shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05770, issued on 8/30/05: A.IV.1 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

1. Compliance with the emission limitation(s) specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

1.a Emission Limitations:

Particulate emissions (PE) and particulate matter 10 microns and less (PM10) emissions shall not exceed 0.11 pound per hour and 0.48 ton per year.

Applicable Compliance Method:

Compliance with the hourly PE limitation stated in A.I.1 shall be demonstrated by multiplying the uncontrolled emission rate of 109 lbs/hr times the baghouse control efficiency, 99.9%.

109 lbs of PE/hr x (1-0.999) = 0.109 lb of PE/hr.

The PE limitation is based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

It shall be assumed that all PE is PM10.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

V. Testing Requirements (continued)

1.b Emission Limitations:

Organic compound (OC) emissions shall not exceed 1.75 pounds per hour and 7.67 tons per year.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated by multiplying the maximum hourly production rate, 11,000 lbs/hr, by the emission factor of 0.250 lb of OC/1000 lbs of soap.

The OC emission limitations are based on the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application number 14-05770 submitted on September 20, 2005. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

1.c Emission Limitation:

Visible particulate emissions shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

2. Compliance with the operational restriction in term and condition A.II.2 shall be determined by the record keeping required in term and condition A.III.1.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

3. Compliance with term and condition A.I.2.b shall be determined by the record keeping required in term and condition A.III.2.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P158 - Making/Packing Line 9-I		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P156, P157 and P158 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Benzyl Acetate

TLV (ug/m3): 61,423

Maximum Hourly Emission Rate (lbs/hr): 7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 441

MAGLC (ug/m3): 1462 ug/m3

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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