



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

10/28/2011

Mr. Chad Brenneman  
PROCTER & GAMBLE MFG CO  
3875 Reservoir Road  
Lima, OH 45801

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

Facility ID: 0302020260  
Permit Number: P0104687  
Permit Type: Administrative Modification  
County: Allen

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Lima News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-NWDO; Indiana

Certified Mail

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





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Procter & Gamble Manufacturing Company was issued a synthetic minor permit on 11-21-08 (#P0086697) for the smaller miscellaneous natural gas burning equipment that is located at it's Lima facility (combined into emissions units B100 & B101). This permit action is a modification to correct the overall capacity of the equipment and increase the allowable fuel usage limitations that are currently in effect on these sources.

3. Facility Emissions and Attainment Status:

This permit modification does not alter the original synthetic minor determination except for the increases in the allowable emission rates for each pollutant associated with the above mentioned changes in capacity. This modification shall keep federal enforceable requirements which limit the potential to emit for nitrogen oxides (NOx) and Carbon Monoxide (CO) through a restriction on the amount of fuel used.

4. Source Emissions:

See Facility Emissions and Attainment Status above.

5. Conclusion:

Limiting the amount of fuel for the these units will effectively restrict annual potential to emit for NOx and CO, yet provide the flexibility the company needs to continue to operate this equipment at desired levels.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	21.93
NOx	26.10



PUBLIC NOTICE

10/28/2011 Issuance of Draft Air Pollution Permit-To-Install and Operate

PROCTER & GAMBLE MFG CO

MUMAUGH & RESERVOIR RD,

Lima, OH 45802

Allen County

FACILITY DESC.: Soap and Other Detergent Manufacturing

PERMIT #: P0104687

PERMIT TYPE: Administrative Modification

PERMIT DESC: Administrative modification to adjust the maximum heat input capacities of the equipment.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: [epa.ohio.gov/dapc/permit](http://epa.ohio.gov/dapc/permit) by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
PROCTER & GAMBLE MFG CO**

Facility ID:	0302020260
Permit Number:	P0104687
Permit Type:	Administrative Modification
Issued:	10/28/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
PROCTER & GAMBLE MFG CO

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 10
1. B100, Misc. NG Fired Equipment (Lima Plant)..... 11
2. B101, Misc NG Fired Equipment (Distribution Center) ..... 16





## Authorization

Facility ID: 0302020260  
Application Number(s): M0000396  
Permit Number: P0104687  
Permit Description: Administrative modification to adjust the maximum heat input capacities of the equipment.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 10/28/2011  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

PROCTER & GAMBLE MFG CO  
MUMAUGH & RESERVOIR RD  
Lima, OH 45802

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0104687  
Permit Description: Administrative modification to adjust the maximum heat input capacities of the equipment.

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

<b>Emissions Unit ID:</b>	<b>B100</b>
Company Equipment ID:	Misc. NG Fired Equipment (Lima Plant)
Superseded Permit Number:	P0086697
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B101</b>
Company Equipment ID:	Misc NG Fired Equipment (Distribution Center)
Superseded Permit Number:	P0086697
General Permit Category and Type:	Not Applicable



## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

## **B. Facility-Wide Terms and Conditions**

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

## **C. Emissions Unit Terms and Conditions**



**1. B100, Misc. NG Fired Equipment (Lima Plant)**

**Operations, Property and/or Equipment Description:**

Incidental fuel burning Equipment located at the “Lima Plant”

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
    - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
      - a. b)(1)a., b)(2)b., c(2), d(2), e(1), f(1)a., and f(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	26.10 tons of nitrogen oxides (NOx) per rolling, 12-month period for emission units B100 and B101, combined [See b)(2)b.]  21.93 tons of carbon monoxide (CO) per rolling, 12-month period for emission units B100 and B101, combined [See b)(2)b.]
b.	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/MMBtu of actual heat input[See b)(2)c.]
c.	OAC rule 3745-17-11(B)	none [See b)(2)d.]
d.	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a 6-minute average, except as specified by rule [See b)(2)e.]
e.	OAC rule 3745-18-06(A)	none [See b)(2)f.]
f.	40 CFR Part 60 Subpart Db	none [See b)(2)g.]

## (2) Additional Terms and Conditions

- a. This emissions unit is comprised of all the current miscellaneous natural gas-fired heaters located at the Procter & Gamble "Lima Plant", located at 3875 Reservoir Road, Lima Ohio. This equipment and consists of Combustor #s 3-12, 14-18, 20-22, 24-36, 38-40, 45-49, the heaters for the phoenix project, construction services, storeroom, break room, and central lab, four space heaters, and four heaters for Spine logistics areas with a total heat input capacity of 72.753 MMBTU/hr.
- b. This permit establishes the following federally enforceable emission limitations based on an fuel usage restriction [See c)(2)] for purposes of limiting potential to emit:
  - i. 26.10 tons of NO<sub>x</sub> per rolling, 12-month period; and
  - ii. 21.93 tons of CO per rolling, 12-month period.

The permittee has requested these federally enforceable limitations for the purpose of avoiding Title V applicability.

- c. The individual pieces of equipment which make up this emissions unit where fuel is burned for the primary purpose of producing heat or power by indirect heat transfer, and have a heat input capacity 1.0 MMBtu/hr or greater are subject to this emission limitation established under OAC rule 3745-17-10(B)(1).
- d. The individual pieces of fuel burning equipment which make up this emissions unit which are potentially affected by OAC rule 3745-17-11 (those pieces where fuel is burned for the primary purpose of producing heat or power by direct heat transfer) are exempt from the requirements of OAC rule 3745-17-11 because the process weight rate equals zero.
- e. The individual pieces of equipment which make up this emissions unit that are subject to the requirements established under OAC rule 3745-17-10 are subject to the visible particulate emissions (PE) limitation specified above.

The remaining individual pieces of equipment which make up this emissions unit are exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-10 and OAC rule 3745-17-11 are not applicable.

- f. The individual pieces of equipment which make up this emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).
- g. This emissions unit is not considered an "Affected Facility" under 40 CFR Part 60 Subpart Db due to the fact that, on an individual basis, the pieces of fuel burning equipment which make up this emissions unit are each below the minimum effected heat input capacity of 10MMBTU/hr.

**c) Operational Restrictions**

- (1) The permittee shall only burn natural gas in the equipment that makes up this emissions unit.
- (2) The maximum annual fuel usage for emissions units B100 and B101, combined, shall not exceed 522.1 million cubic feet (mmcf) of natural gas, based upon a rolling, 12-month summation of the monthly fuel usage rates. This is an existing facility and, as such, natural gas usage records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

**d) Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for emissions units B100 and B101, combined:
  - a. the quantity of natural gas combusted, in mmcf;
  - b. the CO and NOx emission rates\*, in tons;
  - c. the rolling, 12-month natural gas usage rate, in mmcf; and
  - d. the rolling, 12-month CO and NOx emission rates\*, in tons.

\*Calculated using AP-42 Section 1.4, Natural Gas Combustion [7/98]

**e) Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month natural gas usage rate, specified in section c)(2)
    - ii. the rolling, 12-month CO emission limitation specified in section b)(1); and
    - iii. the rolling, 12-month NOx emission limitation specified in section b)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitations:

26.1 tons of NO<sub>x</sub> per rolling, 12-month period

21.93 tons of CO per rolling, 12-month period

Applicable Compliance Method:

Compliance with the emission limitations above shall be demonstrated through the record keeping requirements in section d)(2).

b. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Method:

Compliance with the emission limitation above shall be determined by multiplying the AP-42 emission factor (Table 1.4-2) of 1.9 lb PE/mmcf burned by the maximum fuel flow rate of each respective unit, and then dividing by the maximum heat input rate of each respective unit.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation in accordance with procedures specified in OAC rule 3745-17-03(B).



c. Emission Limitation:

Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



2. B101, Misc NG Fired Equipment (Distribution Center)

Operations, Property and/or Equipment Description:

Misc NG Fired Equipment located at the "Distribution Center"

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
a. None.
(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
a. b)(1)a., b)(2)b., c(2), d(2), e(1), f(1)a., and f(1)b.
b) Applicable Emissions Limitations and/or Control Requirements
(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(D), OAC rule 3745-17-10(B)(1), OAC rule 3745-17-11(B), OAC rule 3745-17-07(A)(1), OAC rule 3745-18-06(A), and 40 CFR Part 60 Subpart Db.

## (2) Additional Terms and Conditions

- a. This emissions unit is comprised of all the current miscellaneous natural gas-fired heaters located at the Procter & Gamble "Distribution Center", located at 637 N. Cool Road, Lima Ohio. This equipment and consists of Combustor #s 3-12, 14-18, 20-22, 24-36, 38-42, 45-49, the heaters for the phoenix project, construction services, storeroom, break room, and central lab, and four heaters for Spine logistics areas with a total maximum heat input of 31.87 MMBTU/hr.
- b. This permit establishes the following federally enforceable emission limitations based on a fuel usage restriction [See c)(2)] for purposes of limiting potential to emit:
  - i. 26.1 tons of NOx per rolling, 12-month period; and
  - ii. 21.93 tons of CO per rolling, 12-month period.

The permittee has requested these federally enforceable limitations for the purpose of avoiding Title V applicability.

- c. The individual pieces of equipment which make up this emissions unit where fuel is burned for the primary purpose of producing heat or power by indirect heat transfer, and have a heat input capacity 1.0 MMBtu/hr or greater are subject to this emission limitation established under OAC rule 3745-17-10(B)(1).
- d. The individual pieces of fuel burning equipment which make up this emissions unit which are potentially affected by OAC rule 3745-17-11 (those pieces where fuel is burned for the primary purpose of producing heat or power by direct heat transfer) are exempt from the requirements of OAC rule 3745-17-11 because the process weight rate equals zero.
- e. The individual pieces of equipment which make up this emissions unit that are subject to the requirements established under OAC rule 3745-17-10 are subject to the visible particulate emissions (PE) limitation specified above.

The remaining individual pieces of equipment which make up this emissions unit are exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-10 and OAC rule 3745-17-11 are not applicable.

- f. The individual pieces of equipment which make up this emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).
- g. This emissions unit is not considered an "Affected Facility" under 40 CFR Part 60 Subpart Db due to the fact that, on an individual basis, the pieces of fuel burning equipment which make up this emissions unit are each below the minimum affected heat input capacity of 10 MMBTU/hr.

**c) Operational Restrictions**

- (1) The permittee shall only burn natural gas in the equipment that makes up this emissions unit.
- (2) The maximum annual fuel usage for emissions units B100 and B101, combined, shall not exceed 522.1 million cubic feet (mmcf) of natural gas, based upon a rolling, 12-month summation of the monthly fuel usage rates. This is an existing facility and, as such, natural gas usage records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

**d) Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for emissions units B100 and B101, combined:
  - a. the quantity of natural gas combusted, in mmcf;
  - b. the CO and NOx emission rates\*, in tons;
  - c. the rolling, 12-month natural gas usage rate, in mmcf; and
  - d. the rolling, 12-month CO and NOx emission rates\*, in tons.

\*Calculated using AP-42 Section 1.4, Natural Gas Combustion [7/98]

**e) Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month natural gas usage rate, specified in section c)(2);
    - ii. the rolling, 12-month CO emission limitation specified in section b)(1); and
    - iii. the rolling, 12-month NOx emission limitation specified in section b)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

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

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitations:

26.1 tons of NO<sub>x</sub> per rolling, 12-month period

21.93 tons of CO per rolling, 12-month period

Applicable Compliance Method:

Compliance with the emission limitations above shall be demonstrated through the record keeping requirements in section d)(2).

b. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Method:

Compliance with the emission limitation shall be determined by multiplying the AP-42 emission factor (Table 1.4-2) of 1.9 lb PE/mmcf burned by the maximum fuel flow rate of each respective unit, and then dividing by the maximum heat input rate of each respective unit.



If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation in accordance with the procedures specified in OAC rule 3745-17-03(B).

c. Emission Limitation:

Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule..

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60 Appendix A.

g) Miscellaneous Requirements

- (1) None.