



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
GUERNSEY COUNTY
Application No: 06-03650

DATE: 12/10/2002

Colgate Palmolive Co Cambridge Plant
Anthony Veltri
8800 Guernsey Industrial Blvd
Cambridge, OH 43725

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 12/10/2002
Effective Date: 12/10/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-03650

Application Number: **06-03650**
APS Premise Number: **0630010015**
Permit Fee: **\$1925**
Name of Facility: **Colgate Palmolive Co Cambridge Plant Veltri**
Person to Contact: **Anthony**
Address: **8800 Guernsey Industrial Blvd
Cambridge, OH 43725**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**8800 Guernsey Industrial Blvd
Cambridge, OHIO**

Description of modification:
Administrative modification to PTI 06-3650 issued 6/9/93 to change the source descriptions.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Colgate Palmolive Co Cambridge Plant
PTI Application: 06-03650
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Facility ID: **0630010015**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Colgate Palmolive Co Cambridge Plant** located in **GUERNSEY** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>			T016	T020
T001		T012		
	T008			
T002			T017	
		T014		T021
	T009			
T003			T018	
	T010			
T006				T022
		T015	T019	
	T011			
T007				

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		T033		
T023	T028		Source Identification Description	39,650 Gallon Detergent Raw Material Solution Storage Tank (T-514)
		T034	20,000 Gallon Caustic Storage Tank (T-503)	30,000 Gallon Detergent Raw Material Solution Storage Tank (T-516)
T024	T029	T035	30,000 Gallon Alcohol Storage Tank (T-504)	30,000 Gallon Detergent Raw Material Solution Storage Tank (T-517)
		T036	30,000 Gallon Detergent Raw Material Solution Storage Tank (T-507)	20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-520)
T026	T030		30,000 Gallon Detergent Raw Material Solution Storage Tank (T-510)	
		T037		
T027	T032	T038	39,650 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-512)	20,000 Gallon Detergent Raw Material Solution Storage Tank (T-521)
				15,000 Gallon Detergent Raw Material, Detergent

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Base and Intermediate Materials Storage Tank (T-526)	12,200 Gallon Detergent Intermediate Material Solution Storage Tank (T-550)	Material, Detergent Base and Intermediate Materials Storage Tank (T-908C)	27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908J)	80,000 Gallon Detergent Raw Materials Solution Storage Tank (T-501)
15,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-524)	18,000 Gallon Sulfur Storage Tank (T-901)	20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908E)	27,000 Gallon Detergent Raw Material Detergent Base and Intermediate Materials Storage Tank (T-908K)	60,000 Gallon Detergent Raw Material Solution Storage Tank (T-502)
20,000 Gallon Detergent Base and Intermediate Materials Storage Tank (T-908A)	20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908A)	20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908F)	27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908L)	40,000 Gallon Detergent Raw Material Solution Storage Tank (T-910)
20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908B)	20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908B)	27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908H)	30,000 Gallon Alcohol Storage Tank (T-929)	40,000 Gallon Detergent Raw Material Solution Storage Tank (T-914)
20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908I)	20,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908I)	27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Storage Tank (T-908I)	14,500 Gallon Ammonia Storage Tank (T-930)	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
BAT <u>Determination</u>	No Control Required		Submerged Fill	
		Submerged Fill and Conservation Vent		Submerged Fill
No Control Required			Submerged Fill	
		Submerged Fill		
Submerged Fill and Conservation Vent	Submerged Fill		Submerged Fill	Submerged Fill
	Submerged Fill			
		Submerged Fill and Conservation Vent		
No Control Required			Submerged Fill	
	Submerged Fill			Submerged Fill
		Submerged Fill		
Submerged Fill	Submerged Fill		Submerged Fill	Submerged Fill

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> 40 CFR 60 Subpart Kb
	Submerged Fill	No Control Required	<u>Applicable Federal & OAC Rules</u> 3745-31-05 (A)(3)	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
Submerged Fill and Conservation Vent		No Control Required	3745-31-05(A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
	Submerged Fill and Conservation Vent	No Control Required	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
Submerged Fill and Conservation Vent	Submerged Fill and Vapor Recovery System When Loading		3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
	No Control Required		3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
Submerged Fill	No Control Required			3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
			3745-31-05 (A)(3)	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		Subpart Kb	40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
3745-31-05 (A)(3)	3745-31-05 (A)(3)			3745-31-05 (A)(3)
40 CFR 60 Subpart Kb	40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31005 (A)(3) 40 CFR 60 Subpart Kb
	3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31005 (A)(3) 40 CFR 60 Subpart Kb
3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31005 (A)(3) 40 CFR 60 Subpart Kb
	3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31-05 (A)(3)	3745-31005 (A)(3) 40 CFR 60 Subpart Kb

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-3 1005 (A)(3) 40 CFR 60 Subpart Kb	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>	Submerged Fill Annual Emission are Negligible	Submerged Fill Annual Emissions are Negligible	Annual Emissions are Negligible
	No Control Required Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible	Submerged Fill and Conservation Vent 0.33 TPY OC	Submerged Fill Annual Emissions are Negligible
	Submerged Fill and Conservation Vent Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible	Submerged Fill Annual Emission are Negligible	Submerged Fill Annual Emissions are Negligible
	No Control Required Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible		
	Submerged Fill Annual Emissions are Negligible	Submerged Fill and Conservation Vent 1.82 TPY OC	Submerged Fill Annual Emissions are Negligible	Submerged Fill and Conservation Vent 0.51 TPY OC
	No Control Required Annual Emissions are Negligible		Submerged Fill	

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	Submerged Fill Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible	No Control Required Annual Emissions are Negligible	
Submerged Fill and Conservation Vent 0.51 TPY OC	Submerged Fill and Conservation Vent 1.82 TPY OC	Submerged Fill and Conservation Vent Annual Emissions are Negligible	No Control Required Annual Emissions are Negligible	
		Submerged Fill and Vapor Recovery System When Loading 0.26 TPY Ammonia		
Submerged Fill and Conservation Vent 0.33 TPY OC	Submerged Fill and Conservation Vent 1.82 TPY OC	No Control Required Annual Emissions are Negligible		
	Submerged Fill Annual Emissions are Negligible	No Control Required Annual Emissions are Negligible		
Submer		No Control Required Annual Emissions are Negligible		

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds	7.63
Ammonia	0.26

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source</u>	<u>Source Description</u>
	T022	
T002	T023	30,000 Gallon Alcohol Tank
T003		30,000 Gallon Detergent Material Solution Tank Raw
T006	T024	30,000 Gallon Detergent Material Solution Tank Raw
T007	T026	39,650 Gallon Detergent Material, Detergent Base and Intermediate Materials Tank Raw
T008		39,650 Gallon Detergent Material Solution Tank Raw
T009	T027	30,000 Gallon Detergent Material Solution Tank Raw
T010	T028	30,000 Gallon Detergent Material Solution Tank Raw
T011	T029	20,000 Gallon Detergent Material, Detergent Base and Intermediate Materials Tank Raw
T012		20,000 Gallon Detergent Material Solution Tank Raw
T014	T030	15,000 Gallon Detergent MaterialDetergent Base and Intermediate Materials Tank Raw
T015	T032	15,000 Gallon Detergent MaterialDetergent Base and Intermediate Materials Tank Raw
T016	T034	20,000 Gallon Detergent MaterialDetergent Base and Intermediate Materials Tank Raw
T019	T035	20,000 Gallon Detergent Material, Detergent Base and Intermediate Materials Tank Raw
T020	T036	20,000 Gallon Detergent Material, Detergent Base and Intermediate Materials Tank Raw
T021	T037	20,000 Gallon Detergent Material, Detergent Base and Intermediate Materials Tank Raw
	T038	20,000 Gallon Detergent Material, Detergent Base and Intermediate Materials Tank Raw

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				<u>NSPS Regulation (Subpart)</u>
20,000 Gallon Intermediate Materials Tank				
Detergent 27,000 Gallon Detergent Raw	Material, Detergent Base		Raw and	Kb
MaterialDetergent Base and Intermediate Materials Tank	Intermediate Materials Tank		Raw and	Kb
20,000 Gallon 30,000 Gallon Alcohol Tank	Intermediate Materials Tank			Kb
Detergent 80,000 Gallon Detergent Raw	Material Solution Tank			Kb
Raw Material, Detergent Base and Intermediate Materials Tank	60,000 Gallon Detergent Material Solution Tank		Raw	Kb
20,000 Gallon 40,000 Gallon Detergent Raw	40,000 Gallon Detergent Material Solution Tank		Raw	Kb
Detergent Raw Material, Detergent Base and Intermediate Materials Tank	40,000 Gallon Detergent Material Solution Tank		Raw	Kb
27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Tank				Kb
27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Tank				Kb
27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Tank				Kb
27,000 Gallon Detergent Raw Material, Detergent Base and Intermediate Materials Tank				Kb

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Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

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1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and SEDO

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Southeast District Office , 2195 Front Street, Logan, Ohio 43138.**

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Southeast District Office , 2195 Front Street, Logan, Ohio 43138.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment

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that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

<u>Source Number(s)</u>	T037
	T038

- T002
- T003
- T006
- T007
- T008
- T009
- T010
- T011
- T012
- T014
- T015
- T016
- T019
- T020
- T021
- T022
- T023
- T024
- T026
- T027
- T028
- T029
- T030
- T032
- T034
- T035
- T036

