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

2/7/2013

Certified Mail

John Koduru
ROYAL CHEMICAL CO
1755 Enterprise Pkwy
Suite 600
Twinsburg, OH 44087

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677080001
Permit Number: P0112790
Permit Type: Renewal
County: Summit

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," 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
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: ARAQMD

FINAL

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

Facility ID:	1677080001
Permit Number:	P0112790
Permit Type:	Renewal
Issued:	2/7/2013
Effective:	2/7/2013
Expiration:	1/5/2021

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

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Authorization

Facility ID:	1677080001
Application Number(s):	A0046733
Permit Number:	P0112790
Permit Description:	Renewal PTIO for bulk blended detergent product Bagger #3 and Dry Powder Bottling Line.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	2/7/2013
Effective Date:	2/7/2013
Expiration Date:	1/5/2021

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ROYAL CHEMICAL CO
8679 FREEWAY DR
MACEDONIA, OH 44056

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112790
Permit Description: Renewal PTIO for bulk blended detergent product Bagger #3 and Dry Powder Bottling Line.

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

Group Name: Dry Detergent Packaging

Emissions Unit ID:	**P907**
Company Equipment ID:	Bagger #3
Superseded Permit Number:	P0103330
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P908**
Company Equipment ID:	Dry Powder Bottling Line
Superseded Permit Number:	P0103330
General Permit Category andType:	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 takenby Ohio EPA on the renewal application.

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] 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.

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

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. Emissions Unit Group - Dry Detergent Packaging: P907,P908

EU ID	Operations, Property and/or Equipment Description
P907	Bagger #3 (Installed 12/01/2006) - Packaging bulk blended detergent product, 4000 pounds per hour maximum process weight rate, particulate emissions controlled by a baghouse.
P908	Powders Bottling Line (Installed 12/01/2006) - Packaging bulk blended detergent product, 4000 pounds per hour maximum process weight rate, particulate emissions controlled by a baghouse.

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

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

a. None.

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Stack particulate emissions (PE)from each emissions unit of this emissions unit group (emissions units P907 and P908) shall not exceed 0.80 pound per hour and 3.5 tons per year. The emissions from this emissions unit group shall be vented to abaghouse when one or more of the emissions units of the group is/are in operation. See b)(2)(a) and (c) through (e) below. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)f.
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)	None. Pursuant to OAC rule 3745-17-07(B)(11)(e), the visible PE limitations specified in paragraphs (B)(1) to(B)(9) of OAC rule 3745-17-07do not apply toany fugitive dust source which is not located within thegeographical areasspecified in appendix A of rule 3745-17-08 of the Administrative Code.
d.	OAC rule 3745-17-08(A)(1)	None. Therequirements of OAC rule 3745-17-08(B) are not applicable toemissions unit P001 since it is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08.
e.	OAC rule 3745-17-11(B)	Per “Figure II” in the appendix to this rule, the maximum allowable mass rate of particulate emissions from all similar process units (bulk blended detergent product packaging operations) at this plant, that pass through a stack or stacks from all such units, shall not exceed 3.68 pounds of particulate emissions per hour. “Table I” to this rule was not used because it is less stringent than Figure II. For purposes of "Figure II" in the appendix to this rule, the total uncontrolledmass rate of emission from all “similar process units” at a plant, such units beingunited either physically or operationally, or otherwise located in close proximityto each other, shall be used for determining the maximum allowable mass rate ofparticulate emissions that pass through a stack or stacks from all such units. Emissions units P901 through P904, P907 and P908 were identified as being “similar process units” at the plant with a

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		total uncontrolledmass rate of emission of 18.4 pounds of particulate emissions per hour from these six emissions units.

(2) Additional Terms and Conditions

a. The 0.80 pound per hour and 3.5 tons per year PE limits established pursuant to OAC rule 3745-31-05(A)(3) are greater than the potential to emit for each emissions unit of this emissions unit group. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in materials processed, change in the method of operation or any other change toanyemissions unit of this emissions unit group that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 for any type of air contaminant not previously emitted.

c. In order to minimize or eliminate visible emissions of fugitive dust, the permittee shall properly install (or have properly installed), adjust, operate and maintain a baghouse (or comparable air pollution control device), associated air pollution control equipment (i.e., hoods, enclosures, ductwork, and fans, etc.) and any other equipment necessary to adequately capture, enclose and contain, with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture, and vent the fugitive dust to the air pollution control device serving each emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.

d. Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the baghouse and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy

BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

f. The following rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. PE (also referred to as total suspended particulate or particulate matter) is an air contaminant without an established NAAQS.

c) Operational Restrictions

(1) The permittee shall employ eachbaghouse serving any emissions unit of this emissions unit group at all times said emissions unit of the group is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall document when a baghouseserving any emissions unit of this emissions unit group was not in service when said emissions unit of the group was in operation.

(2) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across eachbaghouseserving any emissions unit of this emissions unit group when the controlled emissions unit isin operation, including periods of startup and shutdown. The permittee shall record the pressure drop across eachbaghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse shall be maintained within the range specified by the manufacturer, or within an acceptable pressure drop range deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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(s) specified in this permit, 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:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across eachbaghouse 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 permitted limit or range for the pressure drop based upon operating experience or information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of anadministrative modification.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from any stack and for any visible emissions of fugitive dust from any non stack egress point(s) (i.e., building windows, doors, roof monitors, etc.) serving these emissions units. 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. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

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

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing any baghouse serving these emissions units was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The annual PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.It is recommended that the annual PER be submitted electronically through the Ohio EPA's "e-Business Center: Air Services", although PERs can be submitted via U.S. postal service or can be hand delivered.

(3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:

a. all days during which visible particulate emissions were observed from any stack serving this emissions unit;

b. all days during which visible fugitive particulate emissions were observed from any non stackegress point(s) (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

c. any corrective actions taken to minimize or eliminate the visible stack particulate emissions and/or visible fugitive particulate emissions.

(4) The permittee shall identify in the annual PER the following information concerning the operations of eachbaghouse serving these emissions unit during the 12-month reporting period for these emissions units:

a. each period of time (start time and date, and end time and date)when the pressure drop across anybaghouse was outside of its acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit wasin operation and the process emissions were not vented to each baghouse serving this emissions unit, or any baghouse serving these emissions units was not operating when the emissions unit was in operation;

c. each incident of deviation described above where a prompt investigation was not conducted;

d. each incident of deviation described above 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

e. each incident of deviation described above where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

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

b. Emission Limitations:

Stack particulate emissions (PE)from each emissions unit of this emissions unit group (emissions units P907 and P908) shall not exceed 0.80 pound per hour and 3.5 tons per year; and

The maximum allowable mass rate of particulate emissions from all similar process units (bulk blended detergent product packaging operations) at this plant, that pass through a stack or stacks from all such units, shall not exceed 3.68 pounds of particulate emissions per hour.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.