



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
SUMMIT COUNTY
Application No: 16-02386
Fac ID: 1677130079**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/30/2004

Royal Chemical Co
John Koduru
8679 Freeway Dr
Macedonia, OH 44056

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action 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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 11/30/2004
Effective Date: 11/30/2004**

FINAL PERMIT TO INSTALL 16-02386

Application Number: 16-02386
Facility ID: 1677130079
Permit Fee: **\$12550**
Name of Facility: Royal Chemical Co
Person to Contact: John Koduru
Address: 8679 Freeway Dr
Macedonia, OH 44056

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1755 Enterprise Pkwy
Twinsburg, Ohio**

Description of proposed emissions unit(s):
Facility Relocation - Storage Silos, Mixers, Baggers.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	15

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #2: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this

emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:

- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).
4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports

shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is

Royal Chemical Co

PTI Application: 16-02386

Issued: 11/30/2004

Facility ID: 1677130079

Emissions Unit ID: P009

hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P010 (Stainless Steel Mixer PM-2) blending laundry detergent dry solid components, 6500 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #2) serving P009 & P010	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.). This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #2: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$
$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$
$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$
$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$
$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #3: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would

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Emissions Unit ID: P011

cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 (Mild Steel Mixer PM-4) blending laundry detergent dry solid components, 4000 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #3) serving P011, P012, P023, & P902	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.). This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #3: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$
$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$
$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$
$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$
$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

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1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 (Bulk Storage Silo T-2) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #1) serving P013, P014, P016, P017, & P018	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #1: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 (Bulk Storage Silo T-3) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #1) serving P013, P014, P016, P017, & P018	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #1: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P015 (Bulk Storage Silo T-4) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #8)	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #8: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 (Bulk Storage Silo T-5) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #1) serving P013, P014, P016, P017, & P018	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #1: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P017 (Bulk Storage Silo T-6) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #1) serving P013, P014, P016, P017, & P018	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #1: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 (Bulk Storage Silo T-7) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #1) serving P013, P014, P016, P017, & P018	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #1: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 (Bulk Storage Silo T-8) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #6)	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #6: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 (Bulk Storage Silo T-9) pneumatic loading of storage silo with laundry detergent dry solid components, 10 tons/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #7)	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #7: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from the emissions unit and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitation: 5% opacity from fugitive dust, as a 3-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P023 (Mild Steel Mixer PM-5) blending laundry detergent dry solid components, 1000 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #3) serving P011, P012, P023, & P902	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.). This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #3: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$
$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$
$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$
$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$
$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 (Bagging Machine #1) packaging detergent product, 5000 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Local Bag Filter)	OAC rule 3745-31-05(A)(3)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.).
	OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A)	This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Local Bag Filter: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$
$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$
$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$
$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$
$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would

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PTI Application: 16-02386

Issued: 11/30/2004

Facility ID: 1677130079

Emissions Unit ID: P901

cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P902 (Bagging Machine #2) packaging detergent product, 5000 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Baghouse #3) serving P011, P012, P023, & P902	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.). This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Baghouse #3: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$
$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$
$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$
$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$
$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P903 (All-Fill) packaging detergent product, 120 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Local Dust Collect)	OAC rule 3745-31-05(A)(3)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.).
	OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A)	This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Local Dust Collect: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would

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Emissions Unit ID: P903

cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P904 (Form-Fill-Seal) packaging detergent product, 1500 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Local Bag Filter)	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.). This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Local Bag Filter: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$
$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$
$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$
$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$
$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P905 (Pelletizer #1) conversion of powdered final product into tableted final product, 1000 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Local Bag Filter)	OAC rule 3745-31-05(A)(3)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.).
	OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A)	This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Local Bag Filter: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$

$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$

$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$

$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would

cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P906 (Pelletizer #2) conversion of powdered final product into tableted final product, 250 lbs/hr maximum process weight rate, particulate emissions (PE) vented to and controlled by a fabric filter/baghouse (Local Bag Filter)	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	0.33 lb/hr & 1.4 TPY PE (stack emissions) Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average. There shall be no visible PE from building ventilation (i.e., windows, doors, etc.). This facility is not located within an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B). The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The PE mass emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** In order to minimize or eliminate visible emissions of fugitive dust (generated from material transfers, material mixers, and any other fugitive dust-generating stationary plant equipment), the permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter/baghouse system (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 enclose, contain, capture (with a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture), and vent fugitive dust to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of process material from the emissions unit, or cleaning/maintenance of the fabric filter/baghouse system and associated air pollution control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed, as needed, to reduce the risk of fugitive dust emissions.

B. Operational Restrictions

1. The permittee shall employ the fabric filter/baghouse system and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the following specified range (while the emissions unit is in operation):

Local Bag Filter: 1 - 8 inches of water.

Operation of the baghouse outside of its respective pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of the visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter/baghouse system and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

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

- a. Emissions Limitation: 5% opacity from any stack, as a 6-minute average

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

- b. Emissions Limitations: 0.33 lb/hr & 1.4 TPY PE (stack emissions)

Applicable Compliance Method: The above PE limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$
$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.33 \text{ lb/hr PE [hourly controlled potential stack emissions];}$$
$$Y = 1.4 \text{ TPY PE [yearly controlled potential stack emissions];}$$
$$V = 3800 \text{ DSCFM [maximum fabric filter exhaust flow]; and}$$
$$O = 0.01 \text{ grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].}$$

DSCFM = dry standard cubic feet per minute

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.