Procter&Gamble

The Procter & Gamble Company
Sharon Woods Innovation Center
11510 Reed Hartman Hwy. Cincinnati. OH 45241

February 23, 2018

Steven R. Pursley, PE
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

RE: Procter and Gamble – Tabler Station – Minor NSR Air Quality Permit R13-3316D Class II Amendment Application

Dear Mr. Pursley:

As you know, Procter and Gamble (P&G) is constructing a consumer products facility in Berkeley County, West Virginia near the unincorporated community of Tabler Station. The Tabler Station facility will be comprised of a surfactant-making process, liquid soap making process, dry consumer laundry and cleaning products, plastics molding container suppliers, and utilities.

The original application was submitted October 11, 2016, and approved on December 16, 2016. The permit was modified with Class I and Class II administrative amendments which were submitted June 20, 2017, October 26, 2017, and November 16, 2017. The purpose of this application is to request a Class II administrative update to incorporate the following additional site changes:

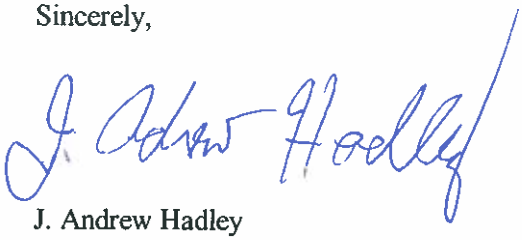
1. Addition of a new manufacturing process area called "Dry Consumer Cleaning Products B-E", which contains raw material tanks, material handling equipment, product converting, and finished product packaging / handling equipment
2. Changes to the stand-by emergency generators[1] at the site, including
    a. Addition of 1-100 kW natural gas generator
3. Changes to the projected printing ink and glue usage at the site.

The proposed changes result in a plant-wide increase in particulates of 1.51 tons per year (tpy), oxides of nitrogen 0.38 tpy, carbon monoxide 0.05 tpy, volatile organic compounds 0.19 tpy, and hazardous air pollutants 0.13 tpy. These changes do not affect the facility's classification as a minor source for Prevention of Significant Deterioration and Title V.

[1] The generators are subject to the recordkeeping and monitoring requirements of New Source Performance Standard Subpart IIII or Subpart JJJJ. Emissions standards may be found in Table 1 in 40 CFR 89.112 (for Subpart IIII) or Table 1 in 40 CFR 60, Subpart JJJJ.

We appreciate your continued support of the P&G-Tabler Station project and your review of this amendment. Please feel free to contact me at 513-765-0497 or Ms. Allison Cole of Trinity Consultants at 540-342-5945 with any questions on the proposed changes.

Sincerely,



J. Andrew Hadley
Environmental, Health, Safety, & Sustainability Manager
Procter & Gamble - NA Product Supply Engineering

Enclosure
cc (w/o enclosure): Mr. Russell Bailey – Trinity Consultants; Ms. Allison Cole - Trinity Consultants

CLASS II ADMINISTRATIVE AMENDMENT

Procter and Gamble

Tabler Station, West Virginia

Prepared By:

TRINITY CONSULTANTS
15 E Salem Ave.
Suite 201
Roanoke, VA 24011
(540) 342-5945

Submitted: February 2018

Project 174701.0020

Trinity Consultants

Environmental solutions delivered uncommonly well

TABLE OF CONTENTS

1.1. FACILITY AND PROJECT DESCRIPTION

Procter and Gamble (P&G) is submitting this Class II administrative amendment to the West Virginia Department of Environmental Protection (DEP) for installation of additional consumer cleaning products lines ("Consumer Cleaning Products B-E") at a facility in Berkley County, West Virginia in the unincorporated community of Tabler Station (Tabler Station facility).

An initial Rule-13 (R-13) permit application was submitted on October 11, 2016 and the final permit was granted on December 16, 2016. Approval of the original application allowed the Tabler Station facility to begin construction on a greenfield facility that will produce liquid soap and Dry Consumer Laundry and Cleaning Products, including dryer applied fabric softener, shampoo, and body wash. The facility will also produce surfactant paste and raw materials which will be used in liquid soap making processes. The facility will have utilities to support the heating, cooling, ventilation, and steam needs of the manufacturing processes. The facility will incorporate third party suppliers who will provide a plastics molding process for the manufacture of bottles, caps, and other formed plastic parts. The addition of Consumer Cleaning Product lines is part of the next phase of construction ("Phase 3").

As indicated in the original R13 permit application, the equipment and operations at the facility are being designed, installed, and started-up in multiple phases. It is anticipated that all phases of this project will be permitted installed, and operated within five years of beginning construction. A thorough analysis of the current scope of the entire facility and planned operations indicates that all phases together do not trigger major new source review (major NSR) permitting, also called prevention of significant deterioration (PSD) permitting. This Class II amendment reflects the next planned and designed phase of the project; scope is consistent with that evaluated in the initial overall project environmental assessment.

A description of each source category applicable to the current project can be found in Section 2. A process flow diagram for the planned phase three operations is included in Attachment F.

1.2. R-13 APPLICATION ORGANIZATION

This R-13 permit application is organized as follows:

- Section 2: Sample Emission Source Calculations;
- Section 3: R-13 Application Forms;
- Attachment A: Business Certificate;
- Attachment C: Installation and Start Up Schedule;
- Attachment D: Regulatory Applicability;
- Attachment E: Plot Plan;
- Attachment F: Detailed Process Flow Diagram;
- Attachment G: Process Description;
- Attachment H: Material Safety Data Sheets
- Attachment I: Emission Units Table;
- Attachment J: Emission Points Data Summary Sheet;
- Attachment K: Fugitive Emissions Data Summary Sheet;
- Attachment L: Emission Unit Data Sheets;
- Attachment M: Air Pollution Control Device Sheet;
- Attachment N: Supporting Emission Calculations;
- Attachment P: Public Notice; and,
- Strike Through Permit.

As part of this phase of the project, P&G proposes to install equipment in the following manufacturing areas:

- Consumer Cleaning Products lines B-E; and,
- A Minor Utilities Revision (additional standby generator capacity).

Each of these business areas will be discussed in greater detail in this section. A process flow diagram is included as Attachment F for Consumer Cleaning Products lines B-E.

In addition, the characteristics of expected site air emissions, along with the methodology used for calculating emissions from the proposed new sources, are described in narrative form below. The Tabler Station facility generally has the potential to emit the following pollutants:

- Oxides of nitrogen (NO_X);
- Sulfur dioxide (SO_2);
- Sulfur trioxide (SO_3);
- Carbon monoxide (CO);
- Sulfuric acid (H_2SO_4);
- Volatile organic compounds (VOC);
- Hazardous air pollutants (HAP);
- Particulate matter (PM);
- Particulate less than 10 micrometers (PM_{10}); and,
- Particulate less than 2.5 micrometers ($PM_{2.5}$).

Detailed supporting calculations are also provided in Attachment N.

2.1. CONSUMER CLEANING PRODUCTS B-E

2.1.1. Process Description

The Tabler Station facility plans to install raw material handling and production lines to manufacture Consumer Cleaning Products B-E. In this process, substrate is unrolled (or manipulated) and raw materials and cleaners are added to the substrate for use as the final product. The process includes delivery of raw materials and transfer of material to holding and mixing tanks. The raw materials and cleaning mixtures are then applied onto a substrate to produce the cleaning article. Once the cleaning articles are complete, they are sent to be packaged and then onto a warehouse for distribution.

The sources of emissions from manufacturing Consumer Cleaning Products for each process line include the following equipment:

- Raw material storage tanks;
- Material handling equipment;
- Converting; and,
- Finished product packaging.

Emissions estimates are based on the raw materials with the highest vapor pressure to account for the potential VOC emissions to represent the multiple formulations in the cleaning article manufacturing process. Emissions estimates can be found in Attachment N.

The proposed Consumer Cleaning Products manufacturing processes will be controlled with the following equipment to control particulate emissions:

- Baghouse

Additional information related to this control device can be found in Attachment M.

As discussed in the next section, a small amount of perfume may be used in the process of raw material addition. Emission points that have the potential to emit odor are controlled with activated carbon. The activated carbon serves as a control for employee comfort, rather than for criteria pollutants, such as VOC. As such, it will not be considered a control device in this application.

2.1.2. Emissions Calculations

2.1.2.1. Vertical Fixed Roof Tank Emission Calculation Methodology

The proposed Consumer Cleaning Products (B-E) area includes fixed roof storage tanks. Fixed roof tanks typically have two major types of emissions: working losses and breathing losses. Working losses occur during the day-to-day operations of the tank from the release of the vapor space as the tank is filled and emptied. Breathing losses occur at outdoor ambient tanks that are subject to daily temperature changes with the weather. Emissions from tanks containing raw materials were calculated using the specific properties of that material. Tank emissions were calculated using procedures outlined in AP-42, Section 7.1.

2.1.2.2. Process of Raw Material Addition

The Consumer Cleaning Products B-E process produces a variety of consumer goods, all of which begin with a substrate. This substrate may receive a variety of raw materials intended to enhance the performance and functionality of the consumer product. The raw materials typically consist of low-volatile, high molecular weight organic materials paired with a small amount of perfume. After the raw materials are applied, the substrate is cut to size, and packaged. A small amount of VOC emissions will result from the application process and subsequent exposed substrate surface. VOC emissions from the process were estimated using a Method 25 stack test from a similar facility (2017).

2.1.2.3. Converting

A baghouse is proposed to control particulate emissions from general clean-up operations in the DCP manufacturing area. PM, PM_{10}, and $PM_{2.5}$ emissions from the baghouse are calculated based on fabric filter grain loading and baghouse flow rates from P&G process knowledge. It is conservatively assumed that PM_{10} and $PM_{2.5}$ emissions are equal to PM emissions.

2.2. UTILITIES

2.2.1. Process Description

To be prepared for power outages, P&G is adding

- One (1) additional 100 kW standby/backup electric generator with a diesel engine.

The 100 kW standby/backup generator will meet U.S. EPA's Tier 3 specifications.

Emissions calculations for the above listed equipment are enclosed in Attachment N of the application. Emissions have been estimated using vendor supplied information, U.S. EPA tier specifications, and applicable AP-42 factors.

2.2.2. Emissions Calculations

2.2.2.1. Standby/Backup Generators

The new generator engine will be subject to the emission limitations in either new source performance standards (NSPS) Subpart IIII (the engine will only be subject to the notification requirements of national emissions standards for hazardous air pollutants [NESHAP] Subpart ZZZZ). To verify compliance with these standards, emissions from the engine are calculated based on emissions factors provided by the manufacturers, U.S. EPA tier specifications, and applicable AP-42 factors. Since this equipment will only operate during emergency situations and routine maintenance and testing, annual emissions are calculated based on 500 hours of operations.[1]

2.3. SOURCES OF MINOR SIGNIFICANCE

Each of the process areas contain emissions units that P&G defines as "sources of minor significance." Some of these sources are already defined as de minimis sources by DEP in 45 CSR 13, Table 45-13b, such as haul road emissions, lab vents, soap tanks, and welding.

DEP has approved an additional de minimis source category ("low-VOC" tanks) for the Tabler Station facility in prior permit modifications. Consistent with that requirement, P&G will maintain a list of "low-VOC" tanks onsite. P&G continues to project that total VOC emissions from all "low-VOC" tanks at the facility will remain less than 1 tpy.

[1] https://www.epa.gov/sites/production/files/2015-08/documents/emgen.pdf

3. R13 APPLICATION FORM

The DEP permit application forms contained in this application include all applicable R-13 application forms including the required attachments.

3WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

APPLICATION FOR NSR PERMIT AND TITLE V PERMIT REVISION (OPTIONAL)

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):

☐ **CONSTRUCTION** ☐ **MODIFICATION** ☐ **RELOCATION**
☐ **CLASS I ADMINISTRATIVE UPDATE** ☐ **TEMPORARY**
☒ **CLASS II ADMINISTRATIVE UPDATE** ☐ **AFTER-THE-FACT**

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):

☐ **ADMINISTRATIVE AMENDMENT** ☐ **MINOR MODIFICATION**
☐ **SIGNIFICANT MODIFICATION**

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant *(as registered with the WV Secretary of State's Office)*:
Procter and Gamble Manufacturing Company

2. Federal Employer ID No. ***(FEIN)***:
31-0411982

3. Name of facility *(if different from above)*:
Tabler Station

4. The applicant is the:
☐ **OWNER** ☐ **OPERATOR** ☒ **BOTH**

5A. Applicant's mailing address:
The Procter & Gamble Company
Sharon Woods Innovation Center
A2M11-3
11510 Reed Hartman Highway
Cincinnati, OH 45241

5B. Facility's present physical address:
Procter & Gamble
396 Development Drive
Inwood, WV 25428

6. **West Virginia Business Registration.** Is the applicant a resident of the State of West Virginia? ☒ **YES** ☐ **NO**
- If **YES,** provide a copy of the **Certificate of Incorporation/Organization/Limited Partnership** (one page) including any name change amendments or other Business Registration Certificate as **Attachment A.**
- If **NO,** provide a copy of the **Certificate of Authority/Authority of L.L.C./Registration** (one page) including any name change amendments or other Business Certificate as **Attachment A.**

7. If applicant is a subsidiary corporation, please provide the name of parent corporation: **N/A**

8. Does the applicant own, lease, have an option to buy or otherwise have control of the *proposed site?* ☒ **YES** ☐ **NO**
- If **YES,** please explain: **Procter and Gamble owns the site.**
- If **NO,** you are not eligible for a permit for this source.

9. Type of plant or facility (stationary source) to be **constructed, modified, relocated, administratively updated** or **temporarily permitted** (e.g., coal preparation plant, primary crusher, etc.):
Facility will produce liquid consumer products and dry consumer laundry and cleaning products.

10. North American Industry Classification System **(NAICS)** code for the facility:
325612, 325613, 325620, 325611

11A. DAQ Plant ID No. (for existing facilities only):
003-00154

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):
R13-3316D

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits,** please provide directions to the *proposed new site location* from the nearest state **road. Include a MAP as Attachment B.**

Exit US Route 81 at exit 8 for Tabler Station Road. Proceed East on Tabler Station Road for 1.1 miles to Development Drive. Turn left on Development Drive and proceed approximately 0.2 miles to site entrance

12.B. New site address (if applicable):	12C. Nearest city or town: **Inwood, WV**	12D. County: **Berkeley County, WV**
12.E. UTM Northing (KM): **4,366**	12F. UTM Easting (KM): **757**	12G. UTM Zone: **17S**

13. Briefly describe the proposed change(s) at the facility:
New Dry Consumer Products Making Area ("Dry Consumer Products B-E"), additional utilities

14A. Provide the date of anticipated installation or change: **03/01/2018** – If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: / /	14B. Date of anticipated Start-Up if a permit is granted: **12/01/2018**

14C. Provide a **Schedule** of the planned **Installation** of/**Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:
Hours Per Day **24** Days Per Week **7** Weeks Per Year **52**

16. Is demolition or physical renovation at an existing facility involved? ☐ **YES** ☒ **NO**

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process *(if known).* A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance *(if known).* Provide this information as **Attachment D.**

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan,** e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to ***Plot Plan Guidance***) .
– Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F.**

23. Provide a **Process Description** as **Attachment G.**
– Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H.**

– For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I.**

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J.**

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K.**

28. Check all applicable **Emissions Unit Data Sheets** listed below:

☐ Bulk Liquid Transfer Operations	☐ Haul Road Emissions	☐ Quarry
☐ Chemical Processes	☐ Hot Mix Asphalt Plant	☐ Solid Materials Sizing, Handling and Storage Facilities
☐ Concrete Batch Plant	☐ Incinerator	☒ Storage Tanks
☐ Grey Iron and Steel Foundry	☐ Indirect Heat Exchanger	

☒ General Emission Unit, specify - **Ink, Glue, Converting Line Vent**

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L.**

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

☐ Absorption Systems	☒ Baghouse	☐ Flare
☐ Adsorption Systems	☐ Condenser	☐ Mechanical Collector
☐ Afterburner	☐ Electrostatic Precipitator	☐ Wet Collecting System

☐ Other Collectors, specify

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M.**

30. Provide all **Supporting Emissions Calculations** as **Attachment N,** or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O.**

➢ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and ***Example Legal Advertisement*** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

☐ **YES** ☒ **NO**

➢ If **YES,** identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's ***"Precautionary Notice – Claims of Confidentiality"*** guidance found in the ***General Instructions*** as **Attachment Q.**

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

☐ Authority of Corporation or Other Business Entity	☐ Authority of Partnership
☐ Authority of Governmental Agency	☐ Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R.**

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned ☒ **Responsible Official** / ☐ **Authorized Representative,** hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE _____ DATE: Jan 19 2018

(Please use blue ink) *(Please use blue ink)*

35B. Printed name of signee: **Francisco Lanza**		35C. Title: Manufacturing Capability Associate Director
35D. E-mail: lanza.fs@pg.com	36E. Phone: 513-626-6440	36F. FAX:
36A. Printed name of contact person (if different from above): **Drew Hadley**		36B. Title: **Environmental Health and Safety Manager NA Supply Network Design**
36C. E-mail: **hadley.ja@pg.com**	36D. Phone: **513-765-0497**	36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- ☒ **Attachment A: Business Certificate**
- ☐ **Attachment B: Map(s)**
- ☒ **Attachment C: Installation and Start Up Schedule**
- ☒ **Attachment D: Regulatory Discussion**
- ☒ **Attachment E: Plot Plan**
- ☒ **Attachment F: Detailed Process Flow Diagram(s)**
- ☒ **Attachment G: Process Description**
- ☒ **Attachment H: Material Safety Data Sheets (MSDS)**
- ☒ **Attachment I: Emission Units Table**
- ☒ **Attachment J: Emission Points Data Summary Sheet**
- ☒ **Attachment K: Fugitive Emissions Data Summary Sheet**
- ☒ **Attachment L: Emissions Unit Data Sheet(s)**
- ☒ **Attachment M: Air Pollution Control Device Sheet(s)**
- ☒ **Attachment N: Supporting Emissions Calculations**
- ☐ **Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans**
- ☒ **Attachment P: Public Notice**
- ☐ **Attachment Q: Business Confidential Claims**
- ☐ **Attachment R: Authority Forms**
- ☐ **Attachment S: Title V Permit Revision Information**
- ☒ **Application Fee**

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

- ☐ ***Forward 1 copy of the application to the Title V Permitting Group and:***
- ☐ ***For Title V Administrative Amendments:***
  - ☐ ***NSR permit writer should notify Title V permit writer of draft permit,***
- ☐ ***For Title V Minor Modifications:***
  - ☐ ***Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,***
  - ☐ ***NSR permit writer should notify Title V permit writer of draft permit.***
- ☐ ***For Title V Significant Modifications processed in parallel with NSR Permit revision:***
  - ☐ ***NSR permit writer should notify a Title V permit writer of draft permit,***
  - ☐ ***Public notice should reference both 45CSR13 and Title V permits,***
  - ☐ ***EPA has 45 day review period of a draft permit.***

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

ATTACHMENT A

Current Business Certificate

WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION CERTIFICATE

ISSUED TO:
THE PROCTER AND GAMBLE MANUFACTURING COMPANY
1 PROCTER AND GAMBLE PLZ
CINCINNATI, OH 45202-3315

BUSINESS REGISTRATION ACCOUNT NUMBER: **2310-7855**

This certificate is issued on: **02/27/2015**

This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code

The person or organization identified on this certificate is registered to conduct business in the State of West Virginia at the location above.

This certificate is not transferrable and must be displayed at the location for which issued

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

atL006 v.4
L1208926528

State of West Virginia

Certificate

I, Natalie E. Tennant, Secretary of State,
of the State of West Virginia, hereby certify that

The Procter and Gamble Manufacturing Company

has filed the appropriate registration documents in my office according to the provisions of the West Virginia Code and hereby declare the organization listed above as duly registered with the Secretary of State's Office.

Given under my hand and
the Great Seal of West Virginia
on this day of
February 23, 2015

Natalie E Tennant

Secretary of State

ATTACHMENT C

Installation and Startup Schedule

Attachment C		
Schedule of Planned Installation and StartUp		
Unit	**Installation Schedule**	**Startup Schedule**
Consumer Cleaning Products B-E	April 2018	December 2018

ATTACHMENT D

Regulatory Applicability

ATTACHMENT D – REGULATORY APPLICABILITY

This section documents the applicability determinations made for Federal and State air quality regulations. In this section, applicability or non-applicability of the following regulatory programs is addressed:

- Prevention of Significant Deterioration (PSD) permitting;
- Minor New Source Review;
- Title V of the 1990 Clean Air Act Amendments;
- New Source Performance Standards (NSPS);
- National Emission Standards for Hazardous Air Pollutants (NESHAP); and
- West Virginia State Implementation Plan (SIP) regulations.

This review is presented to supplement and/or add clarification to the information provided in the West Virginia Department of Environmental Protection (DEP) Rule 13 (R-13) permit application forms. In addition to providing a summary of applicable requirements, this section of the application also provides non-applicability determinations for certain regulations, allowing the DEP to confirm that identified regulations are not applicable to the proposed project. Note that explanations of non-applicability are limited to those regulations for which there may be some question of applicability specific to the operations at the Tabler Station facility. Regulations that are categorically non-applicable are not discussed (e.g., NSPS Subpart J, Standards of Performance for Petroleum Refineries).

Prevention of Significant Deterioration (PSD) Source Classification

Federal construction permitting programs regulate new and modified sources of attainment pollutants under PSD and new and modified sources of non-attainment pollutants under Non-Attainment New Source Review (NNSR). The Tabler Station facility will be located in Berkeley County, West Virginia, which is designated as in attainment/unclassifiable for all pollutants. Therefore, PSD permitting is potentially applicable to the facility. PSD permitting in West Virginia is regulated under Title 45, Series 14, West Virginia Code of State Regulations (45 CSR 14).

PSD permitting applies to construction of new major stationary sources or any physical change in, or change in the method of operation of an existing major stationary source that results in a significant emissions increase. A major stationary source for PSD is defined as:

- Any source in one of the listed source categories in the definition of "major stationary source" per 45 CSR 14-2.43 with the potential-to-emit (PTE) of 100 tons per year (tpy) or more of traditionally regulated pollutants, or
- Any source not in one of the listed source categories with a PTE of 250 tpy or more of any traditionally regulated pollutant.

A review of the legislative background and PSD regulations does not clearly indicate standard industrial classification (SIC) as the defining factor for categorization of a facility as a chemical process plant. However, the United States Environmental Protection Agency (U.S. EPA) has historically interpreted the category "chemical process plants" as including any activity listed under SIC major grouping 28 (with a recent specific exception for ethanol production facilities). SIC 28 has a broader scope than sites where chemical processes are occurring, as SIC 28 is defined as Chemicals and Allied Products, and not simply chemicals. The Allied Products portion of SIC 28 includes multiple activities where there is no chemical processing at all, such as physical blending of ingredients to make finished chemical products to be used for ultimate consumption such as drugs, cosmetics, and soaps [cited from SIC 28 definition]. Most of the proposed site would be classified under SIC 284,

SOAP, DETERGENTS, AND CLEANING PREPARATIONS, PERFUMES, COSMETICS, AND OTHER TOILET PREPARATIONS

Following the U.S. EPA's historic determination, these non-chemical process areas would be considered to be chemical process plants, and thus the facility falls into the group of source categories subject to a 100 tpy major source threshold. Because the facility-wide PTE for each pollutant is less than 100 tpy, the Tabler Station facility will be a new minor source under PSD. As such, PSD permitting is not triggered by this construction activity.

The Tabler Station facility is anticipated to include additional process areas as part of the overall scope of the Tabler Station project. Any additional process areas related to the project which are currently undergoing detailed design will be permitted at a later date. It is anticipated that all phases of this project will be permitted, installed, and operational within 5 years of beginning construction. A thorough analysis of the current scope of the entire facility and planned operations indicates that all phases together do not trigger PSD permitting.

Minor New Source Review Source Classification

The minor (or state) NSR program is codified in 45 CSR 13, and is typically known as an R-13 permit. The Tabler Station facility has an R-13 permit (R13-3316D, issued December 19, 2017). The proposed changes to the potential emission rate for the facility are compared against the emission threshold in 45 CSR 13-2.17 to determine if the changes constitute a permit modification (6 pounds per hour, 10 tons per year, or 144 tons per day of regulated air pollutants). As calculated in Attachment N, the emissions for the proposed project are less than the thresholds for a permit modification. In compliance with R-13, P&G is submitting the attached Class II amendment application for the installation of additional Consumer Cleaning Products lines ("Consumer Cleaning Products B-E") and changes to the utilities area at Tabler Station, West Virginia.

Title V Operating Permit Program

Title 40 of the Code of Federal Regulations Part 70 (40 CFR 70) establishes the federal Title V operating permit program. West Virginia has incorporated the provisions of this federal program in its Title V operating permit program in 45 CSR 30. The major source thresholds with respect to the West Virginia Title V operating permit program regulations are 10 tons per year (tpy) of a single HAP, 25 tpy of any combination of HAPs, and 100 tpy of all other regulated pollutants.[1] The potential emissions of VOC are below the 100 tpy threshold at this facility. Therefore, the Tabler Station facility is not a major source for Title V purposes.

New Source Performance Standards

NSPS require new, reconfigured, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. Moreover, any source subject to an NSPS is also subject to the general provisions of NSPS Subpart A, unless specifically excluded. Following is a discussion of potentially applicable subparts for the proposed emission sources at the Tabler Station facility.

NSPS Subpart A – General Provisions

Any source subject to a NSPS is also subject to the general provisions of NSPS Subpart A, unless specifically excluded.

[1] U.S. EPA's Tailoring Rule had established a Title V major source threshold of 100,000 tpy of greenhouse gas pollutants or GHGs (on a carbon dioxide equivalent [CO_2e] basis). However, on June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA*, whereby the Court said that the U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. Case No. 12-1146, decided June 23, 2014. http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf .

NSPS Subpart Kb – Storage Tanks

NSPS Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels*, regulates storage vessels with a design capacity greater than or equal to 75 cubic meters (m^3) that store volatile organic liquids. The standards are effective for all facilities for which construction, reconstruction, or modification commenced after July 23, 1984. Storage vessels with a capacity greater than or equal to 151 cubic meters (m^3) storing a liquid with a maximum true vapor pressure, excluding water, less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m^3 but less than 151 m^3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from the requirements of this rule.

The tanks at the Tabler Station facility meet the exemption requirements of this rule. Therefore, the Tabler Station facility is exempt from NSPS Kb.

NSPS IIII (4I) – Stationary Compression Ignition Internal Combustion Engines

This subpart is applicable to owners and operators of stationary compression ignition internal combustion engines (CI ICE). There will be one additional CI ICE (backup/standby generator) installed as part of this phase. The backup/standby generator engine is subject to the emission standards in Table 1 of the subpart. The engine is required to use ultra-low sulfur diesel. The backup/standby generator engine will only be used under maintenance conditions or during a loss of power to the site; it will have a limit of 100 hours per year for operation in non-emergency situations. The hours the backup/standby generator engine is operated will be tracked with a non-resettable hour meter. Recordkeeping and monitoring requirements may apply to the backup/standby generator engines.

Non-Applicability of All Other NSPS

NSPS are developed for particular industrial source categories. All other NSPS are categorically not applicable to the proposed change.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

National Emissions Standards for Hazardous Air Pollutants (NESHAP), federal regulations found in Title 40 Part 61 and 63 of the CFR, are emission standards for HAP. NESHAP are applicable to both major sources of HAP (facilities that exceed the major source thresholds of 10 tpy of a single HAP or 25 tpy of any combination of HAP from stationary sources) as well as non-major sources (termed "area sources"). NESHAP apply to sources in specifically regulated industrial source classifications (Clean Air Act Section 112(d)) or on a case-by-case basis (Clean Air Act Section 112(g)) for facilities not regulated as a specific industrial source type. The Tabler Station facility is an area source of HAP. As such, this document only addresses regulatory applicability for area sources and does not include Maximum Achievable Control Technology (MACT) standards for major sources (e.g., 40 CFR Part 63 Subpart FFFF, or the miscellaneous organic chemical NESHAP [MON]).

NESHAP ZZZZ (4Z) – Reciprocating Internal Combustion Engines

NESHAP 4Z establishes emission limitations and operating limitations for HAP emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP.

Per 40 CFR 6590(c)(1), new stationary RICE located at an area source may show compliance with NESHAP 4Z by being in compliance with NSPS 4I or NSPS 4J. All stationary RICE P&G are new and located at an area source of HAP emissions. Therefore, by maintaining compliance with NSPS 4I or NSPS 4J, P&G can demonstrate compliance with NESHAP 4Z.

West Virginia SIP Regulations

The proposed project at the Tabler Station facility is potentially subject to regulations contained in the West Virginia Code of State Regulations, Chapter 45 (Code of State Regulations). West Virginia regulations potentially applicable to the proposed project are discussed below.

45 CSR 4: To Prevent Objectionable Odors

45 CSR 4-2.01 specifies that:

> *No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.*

P&G takes precautions to assure compliance with this rule. Accidental or other infrequent emissions of odor are not provisions of this rule. This regulation is not federally enforceable.

45 CSR 7: To Prevent and Control Particulate Matter from Manufacturing Processes

45 CSR 7 regulates PM emissions from manufacturing processes and associated operations. 45 CSR 7-3, requires a 20% opacity limit from all process source operations. Section 45 CSR 7-4 and Table 45-7A set particulate emissions limits based on the total weight of all materials used by the facility, also known as the process weight. The consumer cleaning products B-E areas qualify as Type 'a' facilities.[2] The total emissions from this operating area are less than 1 lb/hr, which is less than the lowest process weight rule allowable emissions. Therefore, the emissions from this operation meet the standard, and the process weight rule evaluation for the facility has not been updated for this amendment.

45 CSR 16: Standards of Performance for New Stationary Sources

This rule adopts the standards of performance for new stationary sources set forth in 40 CFR Part 60 by reference. Potentially applicable NSPS are discussed above.

45 CSR 21: To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds

45 CSR 21 is intended to require reasonably available control technology for VOC sources in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. As such, these requirements do not apply to VOC sources in Berkeley County.

45 CSR 27: To Prevent and Control the Emissions of Toxic Air Pollutants

West Virginia regulates the emissions of toxic air pollutant emissions through 45 CSR 27. A facility that discharges, or may discharge, a toxic pollutant into the open atmosphere in quantities greater than those delineated in Table A of this rule is required to employ Best Available Technology (BAT) on all chemical processing equipment emitting the pollutant.

The equipment at the Tabler Station facility discharges trace amounts of toxic pollutants during natural gas and diesel combustion. However, the Tabler Station facility does not discharge any of the toxic pollutants in a quantity greater than listed in Table A, as shown in Table D-1. As such, this regulation does not apply to the project at the Tabler Station facility.

[2] Per 45 CSR 7-2.39(a), "Type 'a' means any manufacturing process source operation involving glass melting, calcination, or **physical change** except as noted in type 'c' below." (**emphasis** added)

Table D-1. Evaluation of Toxic Air Pollutants

Pollutant[1]	45 CSR 27 Emission Rate Threshold[1] (lb/yr)	Tabler Station Emission Rate (lb/yr)	Is 45 CSR 27 Applicable?
Acrylonitrile	500	0	No
Allyl Chloride	10,000	0	No
Benzene	1,000	<15	No
1, 3 Butadiene	500	<1	No
Carbon Tetrachloride	1,000	<1	No
Chloroform	1,000	<10	No
Ethylene Dichloride	1,000	0	No
Ethylene Oxide	500	0	No
Formaldehyde	1,000	<160	No
Methylene Chloride	5,000	<1	No
Propylene Oxide	5,000	0	No
Trichloroethylene	10,000	0	No
Vinyl Chloride	1,000	<1	No
Vinylidene Chloride	2,000	0	No

[1] From 40 CSR 27, Table A

45 CSR 31 Confidential Information

45 CSR 31 describes the requirements for claiming confidential information, and the procedures for determinations of confidentiality. Confidentiality may be claimed if the Director determines that the facility meets the criteria detailed in 45 CSR 31-4.1 (a-e). P&G has determined that the Tabler Station R-13 application does not meet the criteria for confidential submittal.

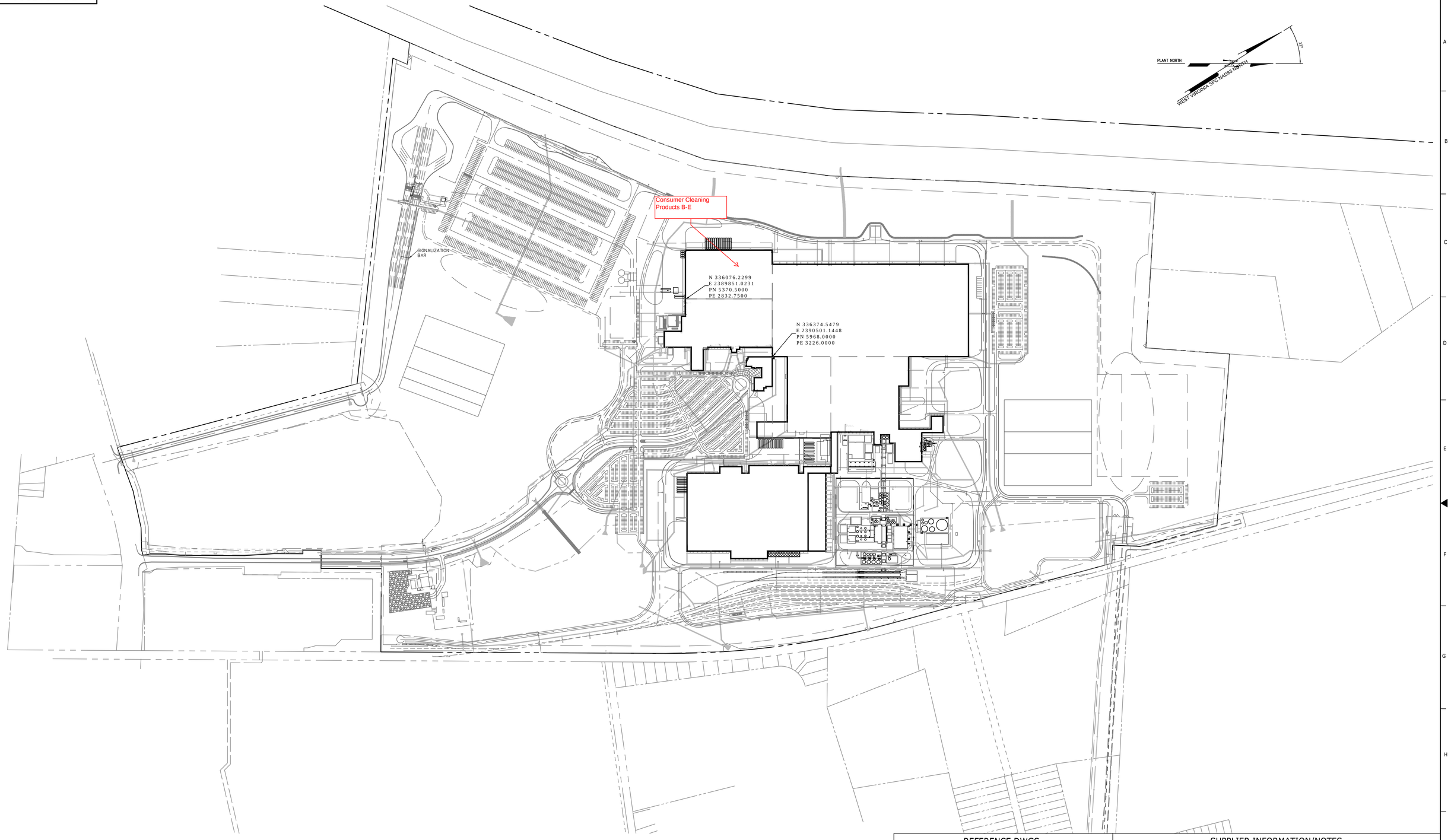
45 CSR 34: Emission Standards for Hazardous Air Pollutants

This rule adopts the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) by reference. Potentially applicable NESHAP are discussed above.

ATTACHMENT E

Plot Plan

PG-4617088



DISTRIBUTED ON 15 JUNE 2017

REFERENCE DWGS	SUPPLIER INFORMATION/NOTES
	FLUOR.

Project No. A7PGTL

THIS DRAWING NOT COMPLETE UNLESS NUMBER IN REV. BLOCKS MATCHES DRAWING ISSUE NUMBER AND BOTH SAFETY, ENVIRONMENTAL, QA/MICRO CHECK BLOCKS ARE SIGNED BY THE RESPONSIBLE P&G APPROVERS.

PROCESS SAFETY STUDY	DWG. REV.#	ENVIRONMENTAL	AIR, DUST AND NOISE	LIQUID & SOLID WASTE	DWG. REV.#	QA/MICRO	DWG. REV.#
( )COMPLETE		( )COMPLETE				( )COMPLETE	
( )NOT REQ'D		( )NOT REQ'D				( )NOT REQ'D	
( )NOT YET DONE		( )NOT YET DONE				( )NOT YET DONE	
APPROVER/DATE MM/DD/YYYY		APPROVER/DATE MM/DD/YYYY		MM/DD/YYYY		APPROVER/DATE MM/DD/YYYY	

Revision History

No	Description	Name/Date
E	ISSUED FOR INFORMATION	DEJ 05-24-2016
F	ISSUED FOR INFORMATION	DEJ 08-30-2016
G	ISSUED FOR INFORMATION	DEJ 11-29-16
D	12M SHIFT WEST & PROTECTED PROGRAM SCOPE	DEJ 11-12-15

RESERVED FOR P.E. STAMP

Drawn By:
Date Drawn: 09/25/2015
Checked By:
Date Checked:

Procter&Gamble

PROJECT INDEPENDENCE

SITE INTEGRATION DRAWING

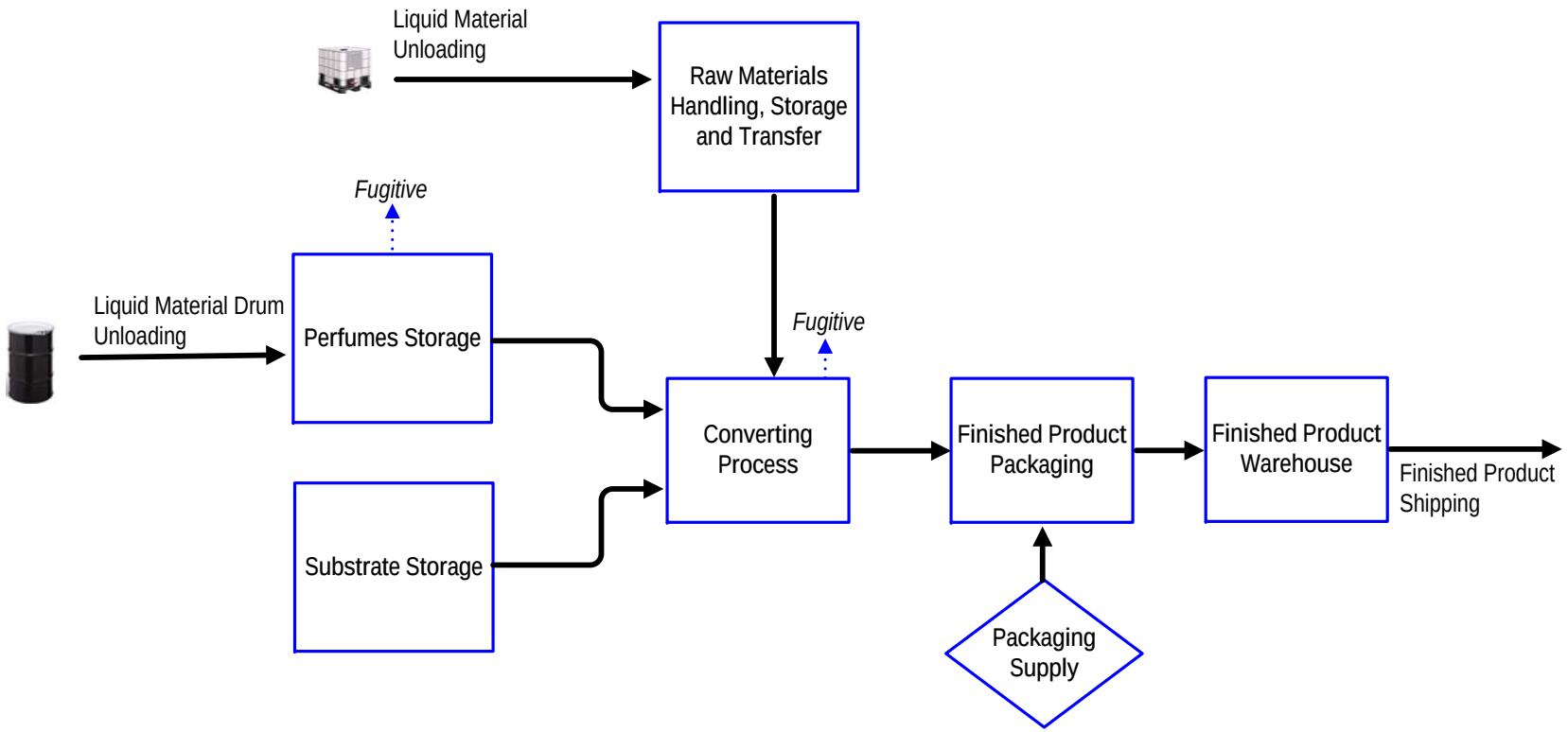
FSWV-001-900

SCALE: 1" = 250'
Supercedes:
Sheet 01 of 01

Drawing Number PG-4617088-RG

ATTACHMENT F

Detailed Process Flow Diagram



Legend

Process Flow

Emissions

P&G – Tabler Station WV

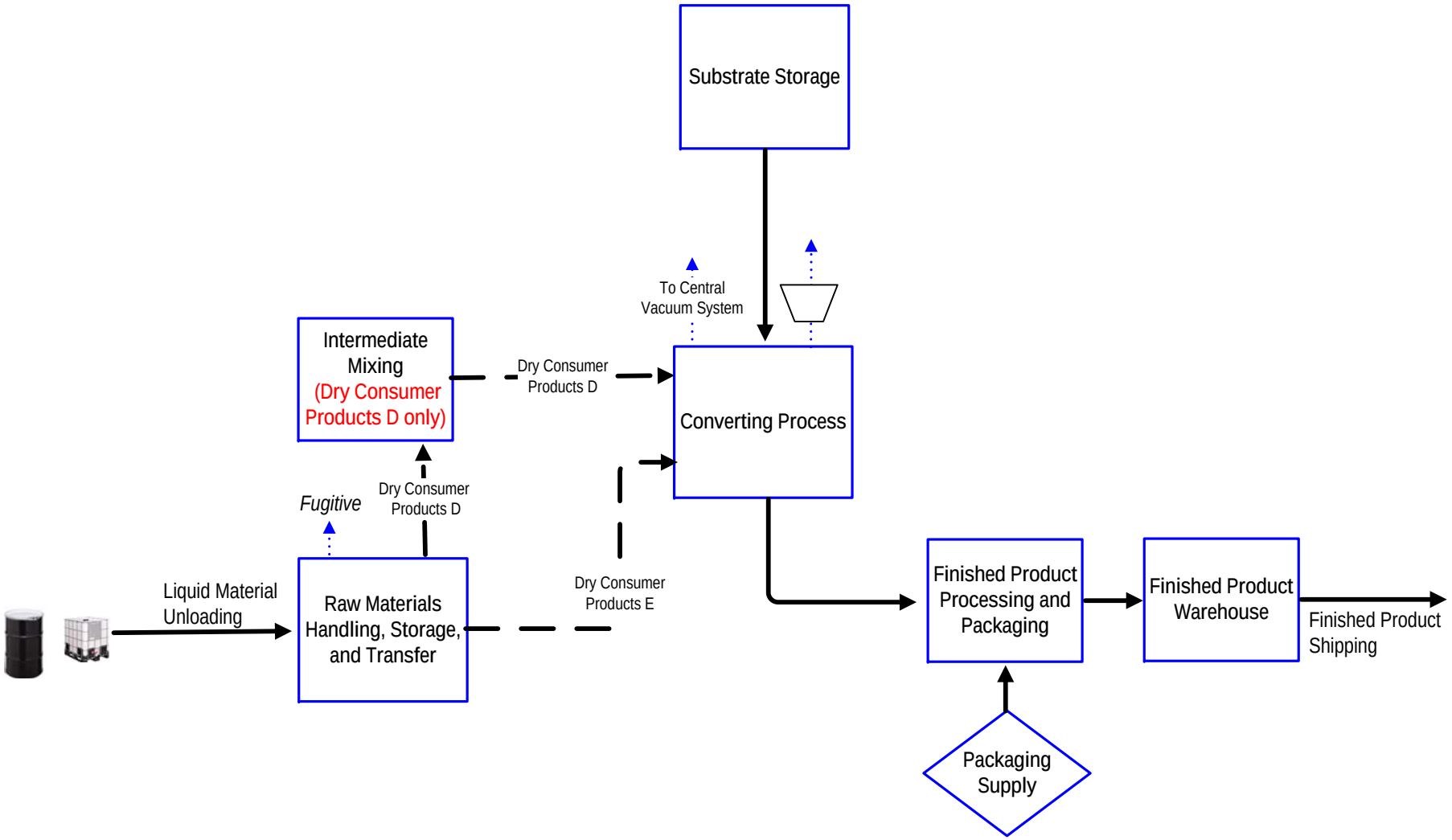
Process Flow Diagram

F1: Consumer Cleaning Products B and C

Trinity Consultants

February 2018

174701.0020



P&G – Tabler Station WV

Process Flow Diagram

F2: Consumer Cleaning Products D and E

Trinity Consultants

February 2018

174701.0020

ATTACHMENT G

Process Description

ATTACHMENT G – PROCESS DESCRIPTION

As part of this project, P&G proposes to install equipment in the following different business areas:

- Consumer Cleaning Products B-E; and
- A Minor Utilities Revision (additional standby generator capacity).

Each of these business areas are discussed in greater detail in the report.

ATTACHMENT H

Material Safety Data Sheets

Tabler Station Site Material Listing

Material Name
Process Areas
18MM Silicone
Acticide M20
Acusol OP 301 Opacifier
Alkyldimethylamines
ALS
AM Triquat
Amine Oxide
Amodimethicone (10TAS)
Antifoam 1410
AXS
Aziridine
Beauty Care (Hair Care, Body Wash) Perfumes (multiple)
Beauty Care Finished Products (multiple)
Bentolite
Benzyl Alcohol
Betaine
Betzdearborn IEC2
Blue Liquid Color
C24 AE1 Alcohol Ethoxylate
C24 AE3 Alcohol Ethoxylate
Caustic, 50%
Caustic, 20%
Cetyl Alcohol
CO1214
Corrshield MD4103
Cutting Oil Thread Cutting Lubricant
DADMAC
DC-1865
DC-1872
DCMC
Deception 5 GNF - Perfume
Diethylene glycol (heat transfer fluid)
Dimethicone (10,000 cSt)
Dimethicone (15-85)
Dissolvine GL-47-S
DM5500 Polydimethyl Siloxane Emulsion
EDDS
Ejector Pin
Ethanol, denatured
Ethoxylated Caster Oil
Fatty Acid
Flogard POT6183
Food Grade Silicone
Formolene HB5502F
Formolene High Density Polyethylene-Hexane Copolymer

Tabler Station Site Material Listing

Material Name
Gengard GN7112
Glycerin
Glydant
HOD Base
Hydrochloric Acid
HydroForce Foaming Citrus All Purpose Cleaner
Hydrogen Peroxide (50%)
IMS Paintable Mist
Inhibitor AZ8101
ISIS M4 2012C
Kathon
KRA
Laureth-4
L-Glutamic Acid
Linole
Lubricating Oil
Marlex KN226 Polyethylene
Marlex KN226 Polyethylene
Microcrystalline Soy Wax
Miramod - Bulk Perfume
Mirapol
MIT M20
Nalco 1720
Nalco 1820
Nalco 3DT 265
Nalco 7320
Nalco 7330
Nalco Nexguard 22310
Neodol 91-8
Neolone
Panthenol
Pantyl
PCMX
Perfume Micro Capsules
Perfumes (multiple)
Petrolatum
Phenoxyethanol
Plantaren
PNB-TR Glycol Ether
Polyethylene Resin
Polypropylene Homopolymer
Polyquaterium - 10
PPG2000
PQAS
Precipated Acid Mix (PAM)
Propylene Glycol (heat transfer fluid)

Tabler Station Site Material Listing

Material Name
Red Liquid Color
S2TS Steol TD 402-65
SAPDMA
Simple Green All-Purpose Cleaner
Slide Mold Cleaner Plus Degreaser 4
Slide Mold Shield Cylinder
Slide Resin Remover Aerosol
Slide Super Grease
Sodium Bicarbonate (aqueous solution)
Sodium Bisulfite
Sodium Chloride 25% Solution
Sodium Chloride Powder
Sodium Chloride Saturated Solution
Sodium Chloride Solution
Sodium Hypochlorite Solution
Sodium Laureth Sulfate SLE1S
Sodium Laureth Sulfate SLE3S
Sodium Lauryl Sulfate SLS
Spectrus NX 1100
Stearyl Alcohol
Step Two Rust Stopper
Sulfuric Acid
Super Grease Aerosol
Surfactant Paste
SXS
TDA-3
Ultimate UV 390-1
Ultra Low Sulfur Diesel Fuel
Uniquat
White Silver-3
Yellow Dye
Lab Chemicals (De minimis)
0.01N Hydrochloric Acid
0.01N Iodine Solution
0.01N Sodium Hydroxide
0.01N Sodium Thiosulfate
0.025M Sodium Sulfate
0.04N Iodine Solution
0.05N Sodium Hydroxide
0.1N EDTA Disodium Salt
0.1N Hydrochloric Acid
0.1N Hydrochloric Acid in IPA
0.1N Iodine Solution
0.1N Perchloric Acid in Acetic Acid
0.1N Silver Nitrate

Tabler Station Site Material Listing

Material Name
0.1N Sodium Hydroxide
0.1N Sodium Thiosulfate
0.1N Sulfuric Acid
0.25N Sodium Hydroxide
0.2M Hydrochloric Acid
0.5N Hydrochloric Acid
0.5N Potassium Hydroxide
1% Hydrochloric Acid
1,3 -dioxane
1,3-Butanediol (butylene glycol)
1,4-dioxane
10% Sodium Hydroxide
1000mg/L Fe standard
1000ppm Iron in dilute acid
1-Chlorodocosane (C22-Cl)
1-Chloroeicosane (C20-Cl)
1-Chlorohexadecane
1-Chlorooctadecane
1-Docosanol
1-Dodecanol
1-Eicosanol
1-Hexadecanol
1N Hydrochloric Acid
1N Sodium Hydroxide
1N Sulfuric Acid
1-Nonadecanol
1-Octadecanol
1-Pentadecanol
1-Tetracosanol
1-Tetradecanol
25% Active AE3S
28-30% Strong Ammonia Solution
2-Phenoxyethanol
37% Formaldehyde Solution
50% Sodium Hydroxide
6mL x 1000mg SAX SPE cartridge
7.5% Hydrogen Peroxide
90% LA-7 AE
Absolute Ethanol
Acc-Fluor Reagent Kit
Acetic Acid
Acetic Acid (HPLC Grade)
Acetone
Acetonitrile (HPLC Grade)
Acetylacetone
Acetylene Gas

Tabler Station Site Material Listing

Material Name
AE3S
Amberlite MB-1 Ion Exchange Resin
Ammonium Acetate
Ammonium Chloride
Ammonium Hydroxide
Ammonium Xylene Sulphonate
Aquamerck Formaldehyde Test Kit (0.1ppm)
Benzoic Acid
Benzyl Alcohol
Benzylaldehyde
BF3/Methanol
Bromocresol Green Indicator
Bromothymol Blue Indicator
Butan-2-ol
Butyl Alcohol
Butyl Paraben
Caffeine, anhydrous
Calcium Chloride Dihydate
Calibration Std
Canon Oil Standard N140
Canon Oil Standard N250
Chloroform
Chromotropic Acid
Citric Acid Monohydrate
Composite 5 Volumetric
Coulomat AG
D6 Cylcomethicone
Decamethylpentasiloxane (D5 Cyclomethicone)
Decanoic Acid
Diethylene Glycol
Dimidium Bromide
Diphenyloxide
Dipropylene Glycol
Dishwashing Detergent
Disodium Dihydrogen Ethylene Diamine Tetra Acetate Dihydrate
Disodium Hydrogen Phosphate Anhydrous
Disodium Hydrogen Phosphate Heptahydrate
Disperse Red 17 Reference Std
Disulfine Blue VN
DNPH
Dodecanol
D-Panthenol
D-Panthenyl Ethyl Ether
Dry Methanol
Eicosanoic Acid
Elaidic Acid

Tabler Station Site Material Listing

Material Name
Electrode Reference Solution
Eriochrome Black
Erythorbic Acid
Ethoxylated Alcohol
Ethylene Glycol
Ethylene Glycol Distearate
Ferric Ammonium Sulfate
Ferric Chloride Hexahydrate
FerroVer Iron Reagent Powder Pillows
FID Check Sample
Filter Paper
Finished Perfume Oil
Flavor Standard
Fluorenone
Formic Acid
Glycerin
Glycine
Heptadecanoic Acid
Hexadecanol
Hexadecyl Hexadecanoate
Hexamethyltrisiloxane (D3 Cyclomethicone)
Hexane
Hyamine 1622
Hydrochloric Acid
Hydrogen Peroxide (30%)
Hydroxylamine Hydrochloride
Iodine
IPBC Standard
Isooctane
Isopropyl Alcohol
Kathon CG/ICP II® (CG/ICP II) Standard
Lauric Acid
Laurinaldehyde
Lead Nitrate
Linoleic Acid
Merckoquant Formaldehyde Test Kit (10ppm)
Methanol
Methanol (HPLC Grade)
Methyl Isobutyl Ketone
Methyl Orange Indicator Solution
Methyl Paraben
Methyl Red Indicator
Methylene Chloride
Methylene Chloride (HPLC Grade)
Mineral Oil, Nujol
Myristic Acid

Tabler Station Site Material Listing

Material Name
N,N-Dimethyl-n-hexadecylamine (C16 DMA)
N,N-Dimethyl-n-octadecylamine (C18 DMA)
Neolone RM
n-Heptane
Nicotinamide
Nitric Acid
Nitrous Oxide Gas
n-Pentacosane
n-Tricosane
Octamethyltetrasiloxane (D4 Cyclomethicone)
Octanoic Acid
Oleic Acid
o-Phenanthroline
Palmitic Acid
Palmitoleic Acid
Paper sample cups with lids
Pentadecanol
Perfume Blotters
Perfume Material Standard
Perfume Raw Materials
Petrolatum
Petroleum Ether
pH 10 Buffer
pH 4 Buffer
pH 7 Buffer
Phenolphthalein Solution
Phosphate Spectroquant Kit
Phosphoric Acid
Phosphoric Acid (HPLC Grade)
Plastic sample cups with lids
p-Nitrophenol, indicator
Potassium Biphthalate
Potassium Bromide Powder
Potassium Chlorate
Potassium Chromate Indicator
Potassium Dihydrogen Phosphate
Potassium hexacyanoferrate (II)
Potassium hexacyanoferrate (III)
Potassium Hydrogen Phthalate
Potassium Hydroxide (pellets)
Potassium Iodide
Propyl Paraben
Salicyl Alcohol
Silicone anti-foam
Sodium Chloride
Sodium Dihydrogen Phosphate Monohydrate

Tabler Station Site Material Listing

Material Name
Sodium Lauryl Sulfate
Sodium Sulfate
Sodium Thiosulfate
SP Brand MICRO
Squalane
Starch Indicator
Stearic Acid
Sulfuric Acid
Sulfuric Acid (<0.1ppm Chloride)
Sylon BFT
Target Appearance Std
Target Odor Standards
Tetradecanol
Tetrahydrofuran
Toluene
Tridecanoic Acid
Tridecanol
Trisodium Citrate Dihydrate
Triton X-100
Trizma Base
Water Standard

ATTACHMENT I

Emission Units Table

Attachment I
Emission Units Table

(includes all emission units and air pollution control devices that will be part of this permit application review, regardless of permitting status)

Emission Unit ID[1]	Emission Point ID[2]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type[3] and date of Change	Control Device[4]
257S	226E	Printing Ink	2018	39,880 lb/year	Modification	--
258S	227E	Case Packing Glue	2018	940,161 lb/year	Modification	--
284S	254E	CCP B-E Tank	2018	170 gal	New	--
285S	255E	CCP B-E Tank	2018	170 gal	New	--
286S	256E	CCP B-E Tank	2018	170 gal	New	--
287S	257E	CCP B-E Tank	2018	170 gal	New	--
288S	258E	CCP B-E Baghouse	2018	4,000 scfm	New	27C
289S	259E	Converting Operations Vent	2018	n/a	New	--
290S	260E	Backup/Standby Generator	2018	100 kW	New	--

1) For Emission Units (or Sources) use the following numbering system:1S, 2S, 3S,... or other appropriate designation
2) For Emission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation.
3) New, modification, removal
4) For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

ATTACHMENT J

Emission Points Data Summary Sheet

Attachment J

EMISSION POINTS SUMMARY SHEET

Table 1: Emissions Data

Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type[1]	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (Chemical Processes only)		All Regulated Pollutants - Chemical Name/CAS3 (Speciate VOCs and HAPS)	Maximum Potential Uncontrolled Emissions[4]		Maximum Potential Controlled Emissions[5]		Emission Form or Phase (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used[6]	Emission Concentration[7] (ppmv or mg/m^4)
		ID No.	Source	ID No.	Device Type	Short Term[2]	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
233E - 234E and 250E - 252E and 260E	Upward Vertical Stack	N/A	Backup/Standby Power Generator	N/A	N/A	N/A	N/A	NO_X	16.5	4.1	16.5	4.1	Gas	O - Vendor	
								CO	4.9	1.23	4.9	1.23			
								SO_2	6.1E-03	1.5E-03	6.09E-03	1.5E-03			
								VOC	0.91	2.3E-01	0.91	2.3E-01			
								PM	2.9E-01	7.2E-02	2.86E-01	7.2E-02			
								PM_{10}	2.6E-01	6.4E-02	2.55E-01	6.4E-02			
								$PM_{2.5}$	2.6E-01	6.4E-02	2.55E-01	6.4E-02			
								HAP	9.7E-02	2.4E-02	9.71E-02	2.4E-02			
226E	Fugitive	N/A	Printing Ink	N/A	N/A	N/A	N/A	VOC	1.44E-01	6.33E-01	1.4E-01	6.33E-01	Gas	EE	
								HAP	1.44E-01	6.33E-01	1.4E-01	6.33E-01			
227E	Fugitive	N/A	Case Packing Glue	N/A	N/A	N/A	N/A	VOC	6.44E-02	2.82E-01	6.4E-02	2.82E-01	Gas	EE	
								HAP	2.15E-03	9.40E-03	2.1E-03	9.40E-03	Gas	EE	
254E - 257E	Upward Vertical Stack	N/A	CCP B-E Tank	N/A	N/A	N/A	N/A	VOC	1.35E-01	5.91E-01	1.3E-01	5.91E-01	Gas	O - AP-42	
								HAP	1.35E-02	5.91E-02	1.3E-02	5.91E-02			
258E	Upward Vertical Stack	N/A	CCP B-E Baghouse	N/A	N/A	N/A	N/A	PM	3.43E-01	1.50E+00	3.4E-01	1.50E+00	Solid	O - AP-42	
								PM_{10}	3.43E-01	1.50E+00	3.4E-01	1.50E+00			
								$PM_{2.5}$	3.43E-01	1.50E+00	3.4E-01	1.50E+00			
259E	Upward Vertical Stack	N/A	Converting Operations Vent	N/A	N/A	N/A	N/A	VOC	1.09E-01	4.78E-01	1.1E-01	4.78E-01	Gas	Representative ST -2017	

Attachment J								
EMISSION POINTS SUMMARY SHEET								
Table 2: Release Parameter Data								
Emission Point ID No. (Must match Emission Units Table)	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (^{o}f)	Volumetric Flow[1] (acfm) *at operating conditions*	Velocity (fps)	Ground Level *(Height above mean sea level)*	Stack Height[2] *(Release height of emissions above ground level)*	Northing	Easting
233E - 234E and 250E - 252E and 260E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
254E - 257E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
258E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
259E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

ATTACHMENT K

Fugitive Emissions Data Summary Sheet

Attachment K			
FUGITIVE EMISSIONS DATA SUMMARY SHEET			
Question		**YES/NO**	**if YES:**
1	Will there be haul road activities?	No	Complete **haul road emissions unit data sheet**
2	Will there be storage piles?	No	Complete **Table 1 of nonmetallic minerals processing emissions unit data sheet**
3	Will there be liquid loading/unloading operations?	No	Complete **bulk liquid transfer operations emissions unit data sheet**
4	Will there be emissions of air pollutants from wastewater treatment evaporation?	No	Complete **general emissions unit data sheet**
5	Will there be equipment leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)?	No	Complete **leak source data sheet** section of the **chemical processes emissions unit data sheet**
6	Will there be General Clean-up VOC Operations?	No	Complete the **general emissions unit data sheet**
7	Will there be any other activities that generate fugitive emissions?	Yes	Complete the **general emissions unit data sheet** or most appropriate form

Attachment K						
FUGITIVE EMISSIONS DATA SUMMARY SHEET						
FUGITIVE EMISSIONS SUMMARY	All Regulated Pollutants - Chemical Name/CAS	Maximum Potential Uncontrolled Emissions		Maximum Potential Controlled Emissions		Est. Method Used
		lb/hr	ton/yr	lb/hr	ton/yr	
Haul Road/Road Dust Emissions	NA	NA	NA	NA	NA	NA
Paved Haul Roads	NA	NA	NA	NA	NA	NA
Unpaved Haul Roads	NA	NA	NA	NA	NA	NA
Storage Pile Emissions	NA	NA	NA	NA	NA	NA
Loading/Unloading Operations	$PM_{10}/PM_{2.5}$	NA	NA	NA	NA	NA
	VOC	NA	NA	NA	NA	
	HAP	NA	NA	NA	NA	
	H_2SO_4	NA	NA	NA	NA	
Wastewater Treatment Evaporation & Operations	NA	NA	NA	NA	NA	NA
Equipment Leaks	NA	NA	NA	NA	NA	NA
General Clean-up VOC Emissions	NA	NA	NA	NA	NA	NA
Ink Printers	VOC	1.44E-01	6.33E-01	1.44E-01	6.33E-01	EE - Engineering Estimate
	Glycol Ether	1.44E-01	6.33E-01	1.44E-01	6.33E-01	
Case Packing Glue	VOC	6.44E-02	2.82E-01	6.44E-02	2.82E-01	EE - Engineering Estimate
	Vinyl Acetate	2.15E-03	9.40E-03	2.15E-03	9.40E-03	
Other	NA - Fugitive emissions from tanks are calculated in Attachment L					

ATTACHMENT L

Emission Unit Data Sheet

Attachment L

EMISSIONS UNIT DATA SHEET - STORAGE AND PROCESS TANKS

1	3	4	6	8	9A	9B	10A	13A	18	20	22A	22B	22C	27	38B	39C	39D	40	41				
Bulk Storage Area Name	**Tank Equipment Identification Number**	**Emission Point Identification Number**	**Type of Change**	**Capacity (gallons)**	**Internal Diameter (ft)**	**Internal Height (ft)**	**Max Liquid Height**	**Max Annual Throughput (gal/yr)**	**Type of Tank**	**Shell Color/Roof Color**	**Are the Tanks Heated?**	**Provide the operating temperature (F)**	**Describe how heat is provided to the tank**	**City/State for TANKS calculations**	**Max Vapor Pressure (psi)**	**Liquid Density (lb/gal)**	**Liquid Molecular Weight (lb/lb-mol)**	**Emission Control Devices**	**Material Classification**	**Annual Loss (lb/year)**	**Material Classification**	**Annual Loss (lb/year)**	**Estimation Method**
CCP B-E	284S	254E	New Const.	170 gal	2.25	5.85	3.86	697,471	Vertical Fixed Roof Aboveground	Grey/Grey	No	Ambient	n/a	Dulles Airport, Washington DC	0.50	8.00	200	N/A	VOC	296	HAP	30	EPA
CCP B-E	285S	255E	New Const.	170 gal	2.25	5.85	3.86	697,471	Vertical Fixed Roof Aboveground	Grey/Grey	No	Ambient	n/a	Dulles Airport, Washington DC	0.50	8.00	200	N/A	VOC	296	HAP	30	EPA
CCP B-E	286S	256E	New Const.	170 gal	2.25	5.85	3.86	697,471	Vertical Fixed Roof Aboveground	Grey/Grey	No	Ambient	n/a	Dulles Airport, Washington DC	0.50	8.00	200	N/A	VOC	296	HAP	30	EPA
CCP B-E	287S	257E	New Const.	170 gal	2.25	5.85	3.86	697,471	Vertical Fixed Roof Aboveground	Grey/Grey	No	Ambient	n/a	Dulles Airport, Washington DC	0.50	8.00	200	N/A	VOC	296	HAP	30	EPA

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	**Question:**	**Response:**	**Notes:**
	Sheet version:	General	
0	Identification Number	257S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Printing Ink	
4	Names and maximum amount of proposed process materials produced per hour	4.55 lb/hr	lb/hr (of materials that contain VOC and/or HAP)
5	Give chemical reactions, if applicable, that will be involved in the generation of air pollutants	N/A	
7	Projected operating schedule	24/7/365	
8	Pollutant	VOC	
	Emission Rate (lb/hr)	1.44E-01	
	Pollutant	HAP	
	Emission Rate (lb/hr)	1.44E-01	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	**Question:**	**Response:**	**Notes:**
	Sheet version:	General	
0	Identification Number	258S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Case Packing Glue	
4	Names and maximum amount of proposed process materials produced per hour	107 lb/hr	lb/hr (of materials that contain VOC and/or HAP)
5	Give chemical reactions, if applicable, that will be involved in the generation of air pollutants	N/A	
7	Projected operating schedule	24/7/365	
8	Pollutant	VOC	
	Emission Rate (lb/hr)	6.44E-02	
	Pollutant	HAP	
	Emission Rate (lb/hr)	2.1E-03	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	**Question:**	**Response:**	**Notes:**
	Sheet version:	General	
0	Identification Number	289S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Converting Operations Vent	
4	Names and maximum amount of proposed process materials produced per hour	n/a	gal/hour of finished product
5	Give chemical reactions, if applicable, that will be involved in the generation of air pollutants	N/A	
7	Projected operating schedule	24/7/365	
8	Pollutant	VOC	
	Emission Rate (lb/hr)	1.1E-01	

ATTACHMENT M

Air Pollution Control Device Sheet

Attachment M			
AIR POLLUTION CONTROL DEVICE SHEET			
Number:	**Question:**	**Response:**	**Notes:**
	Sheet version:	Baghouse	
	Equipment Description	Baghouse Filter	
0	Control device ID No.:	27C	Must match Emission Units Table
16	Gas flow rate into collector:	~4,000	ACFM
21	Particulate Loading (outlet):	0.01	grain/scf

ATTACHMENT N

Supporting Emission Calculations

Table N-0a. Emissions Summary

Business Unit/Process	Potential to Emit (tpy)								
	PM	PM_{10}	$PM_{2.5}$	VOC	HAPs	NO_x	CO	SO_2	H_2SO_4
Chemicals	**21.7**	**21.7**	**21.7**	**5.7**	**9.2E-02**	**4.7**	**2.9E-01**	**1.4**	**17.6**
Tanks	--	--	--	1.54	9.1E-02	--	--	--	1.5E-03
Loading	--	--	1.22E-04	5.45E-02	--	--	--	--	1.2E-04
SO_2 Scrubber	21.7	21.7	21.7	4.1	1.1E-03	4.7	2.9E-01	1.4	17.6
Soap Making A & B	**20.0**	**20.0**	**20.0**	**43.9**	**3.1E-02**	**1.1**	**5.8**	**6.2E-03**	**0.0**
Tanks	--	--	--	2.5	3.1E-02	--	--	--	--
RTO	6.5E-02	6.5E-02	6.5E-02	8.0	5.2E-06	1.1	5.8	6.2E-03	--
Dust Control	19.97	20.0	20.0	33.4	--	--	--	--	--
Packing/Filling	--	--	--	1.11E-03	--	--	--	--	--
Soap Making C	**1.03E-02**	**1.03E-02**	**1.03E-02**	**2.95**	**5.83E-02**	**0.0**	**0.0**	**0.0**	**0.0**
Tanks	1.03E-02	1.03E-02	1.03E-02	0.55	--	--	--	--	--
Packing/Filling	--	--	--	1.75	2.31E-03	--	--	--	--
Truck Loading	--	--	--	0.65	5.59E-02	--	--	--	--
Consumer Cleaning Products A	**16.7**	**16.7**	**16.7**	**9.7**	**5.3E-03**	**0.0**	**0.0**	**0.0**	**0.0**
Tanks	--	--	--	1.1	5.3E-03	--	--	--	--
Converting	16.7	16.7	16.7	--	--	--	--	--	--
Additive	--	--	--	8.7	--	--	--	--	--
Consumer Cleaning Products B-E	**1.50**	**1.50**	**1.50**	**1.07**	**5.91E-02**	**0.0**	**0.0**	**0.0**	**0.0**
Tanks	--	--	--	0.59	5.91E-02	--	--	--	--
Baghouse	1.50	1.50	1.50	--	--	--	--	--	--
Converting Operations Vent	--	--	--	0.48	--	--	--	--	--
Utilities	**9.8**	**8.6**	**5.8**	**16.2**	**1.5**	**58.7**	**33.5**	**4.6E-01**	**5.0E-03**
Boilers	3.1	5.1	5.1	2.46	1.27	49.54	25.33	4.1E-01	4.5E-03
Engines	1.2E-01	1.1E-01	1.1E-01	0.27	3.3E-02	5.27	1.58	2.1E-03	--
Cooling Towers	5.9	2.8	2.32E-03	--	--	--	--	--	--
Heaters	6.0E-01	6.0E-01	6.0E-01	4.3E-01	1.5E-01	3.9	6.6	4.7E-02	5.1E-04
Fuel Tanks	--	--	--	2.3E-03	--	--	--	--	--
Water Treatment Chemicals	--	--	--	13.0	4.0E-03	--	--	--	--
Auxiliary Activities	**10.67**	**6.29**	**4.79**	**10.40**	**7.81E-01**	**3.65**	**6.14**	**4.4E-02**	**4.7E-04**
Glue Usage	--	--	--	2.82E-01	9.40E-03	--	--	--	--
Printing	--	--	--	6.33E-01	6.33E-01	--	--	--	--
Paved Roads	4.25	8.50E-01	2.09E-01	--	--	--	--	--	--
Plastics Molding	6.42	5.44	4.58	9.49	1.4E-01	3.65	6.14	4.4E-02	4.7E-04
De Minimis Sources[1]	**--**	**--**	**--**	**1.00**	**--**	**--**	**--**	**--**	**--**
Total	**80.36**	**74.85**	**70.56**	**90.91**	**2.48**	**68.12**	**45.76**	**1.92**	**17.59**

1. De Minimis sources category assigned to "low VOC tanks", which have an emission rate of 0.005 tpy VOC or less.

Table N-0b. HAP - Emissions Summary

HAP Emissions	Potential to Emit												
	Hexane	Ethylene Oxide	Formaldehyde	Vinyl Acetate	1,4 Dioxane	Hydrogen Chloride	Acetophenone	Propylene	Chloroform	Lead	Glycol Ether	Benzene	Other Combustion HAP[1]
Total (tpy)	**1.48E+00**	**4.75E-02**	**7.46E-02**	**9.40E-03**	**5.27E-02**	**1.85E-02**	**6.73E-04**	**1.23E-02**	**4.00E-03**	**4.15E-04**	**7.58E-01**	**6.76E-03**	**2.06E-02**
Total (lb/yr)	**2,954**	**95**	**149**	**19**	**105**	**37**	**1.35**	**25**	**8.00**	**0.83**	**1,515**	**14**	**41**

1. Includes: 2-methylnaphthalene, 3-methylchloranthrene, 7,12-Dimethylbenz(a)anthracene, acetaldehyde, acenaphthene, acenaphthylene, acrolein, anthracene, benz(a)anthracene, benzo(a)pyrene, bezo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, dichlorobenzene, ethylbenzene, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, naphthalene, OCDD, PAH, phenanathrene, pyrene, toluene, 1,1,1-Trichloroethane, o-xylene, xylenes, arsenic, antimony, beryllium, cadmium, chloride, chromium, chromium VI, cobalt, fluoride, manganese, mercury, nickel, phosphorus, selenium.

Table N-51. Soap Making Business C - Truck Loading Emissions

EU ID	Description	Throughput[1] (gal/yr)	Vapor Pressure Group	Vapor Pressure[1] (psia)	Molecular Weight[1] (lb/lb-mol)	Temperature of Liquid[1] (°F)	Density (lb/gal)[1]	Saturation Factor	Loading Loss[2] (lb/10^3 gal)	VOC Emissions		HAP Emissions	
										(lb/hr)	(tpy)	(lb/hr)	(tpy)
278	Bulk Truck Loadout	2,000,000	3	0.50	92.25	70	8.39	0.60	0.65	1.49E-01	6.51E-01	1.28E-02	5.59E-02

1. Finished product chemical data and operating conditions (i.e., temperature and throughput) for truck loading per correspondence with Darrin Brockman (P&G) on February 2, 2016.

2. Loading loss emission factors calculated per AP-42, Chapter 5.2 (Transportation and Marketing of Petroleum Liquids), Equation 1. Assumes submerged filling.

Table N-56. Consumer Cleaning Products B-E - Storage Tank Emissions

EU ID	Description	Throughput[1] (gal/yr)	Vapor Pressure[2] (psia)	Molecular Weight[2] (lb/lb-mol)	Bulk Liquid Temperature[3] (°F)	Liquid Density[2] (lb/gal)	Capacity (gal)	VOC Potential to Emit[4] (lb/hr)	VOC Potential to Emit[4] (tpy)	HAP Potential to Emit[5] (lb/hr)	HAP Potential to Emit[5] (tpy)
284	Perfume 1	697,471	0.50	200	Ambient	8.00	170	3.37E-02	1.48E-01	3.37E-03	1.48E-02
285	Perfume 2	697,471	0.50	200	Ambient	8.00	170	3.37E-02	1.48E-01	3.37E-03	1.48E-02
286	Perfume 3	697,471	0.50	200	Ambient	8.00	170	3.37E-02	1.48E-01	3.37E-03	1.48E-02
287	Perfume 4	697,471	0.50	200	Ambient	8.00	170	3.37E-02	1.48E-01	3.37E-03	1.48E-02
Total								***1.35E-01***	***5.91E-01***	***1.35E-02***	***5.91E-02***

1. Tank capacities and throughputs per Procter and Gamble design data sheets.
2. Raw material chemical properties per Procter and Gamble design data sheets.
3. Storage tanks are unheated and uninsulated.
4. Emissions calculated per AP-42, Section 7.1 (*Organic Liquid Storage Tanks*) and Trinity calculations spreadsheets. Specifically, equations contained in Section 7.1.3.1 (*Total Losses from Fixed Roof Tanks*) are utilized.
5. HAP emissions from perfumes assumed to be 10% of VOC emissions. Based on knowledge of raw materials, HAPs are 99% glycol ether and 1% acetophenone.

Table N-57. Consumer Cleaning Products B-E - Baghouse Emissions

EU ID	Description	Control Type	Hours/Year Utilized	Fabric Filter Efficiency[1] (gr/scf)	Air Flowrate[2] (scfm)	$PM/PM_{10}/PM_{2.5}$ Potential to Emit	
						(lb/hr)	(tpy)
288	Central Vacuum System	Fabric Filter	8,760	0.01	4,000	0.34	1.50
					TOTAL	**0.34**	**1.50**

1. Conservative assumptions based on P&G process knowledge for Consumer Cleaning Products.
2. Air flowrate per Procter and Gamble process specifications.

Table N-58. Consumer Cleaning Products B-E - Converting Operations Vent Emissions

Emissions Unit	Process Description	VOC Emissions[1] (g/s)	(lb/hr)	(tpy)
289	DCP B-E Converting Line Vent	0.01	0.11	0.48

1. THC emissions (as methane) measured using Method 25 at comparable site (2017). Emissions rate doubled to account for uncertainty. THC emissions (as methane) are assumed to be equal to VOC.

Table N-15. Utilities - Overall Utility Inventory

Equipment Type	Quantity	Design Size	
		Value	Units
Boilers	2	50,267	pph steam
	1	27,600	pph steam
	1	8,918	pph steam
Cooling Towers	1	331	Mgal/hr
	1	792	Mgal/hr
	1	212	Mgal/hr
Fire Pump Engine	2	399	hp
Backup/Standby Power Generator	1	600	kW
Backup/Standby Power Generator	1	200	kW
Backup/Standby Power Generator	1	150	kW
Backup/Standby Power Generator	1	83	kW
Backup/Standby Power Generator	1	200	kW
Backup/Standby Power Generator	1	100	kW
Engine ULSD Tanks	3	< 500	gallon
Vehicle Refueling ULSD Tank	1	5,000	gallon
Warehouse Heaters	6	3.05	MMBtu/hr

Equipment Type	Quantity	Design Size		Weighted Heat of Vaporization[1] (Btu/lb)	Boiler Efficiency (HHV)	Calculated Size	
		Value	Units			Value	Units
Boilers	2	50,267	pph steam	1,048.4	85%	62	MMBtu/hr
	1	27,600	pph steam	1,048.4	83%	32.63	MMBtu/hr
	1	8,918	pph steam	1,048.4	85%	11	MMBtu/hr

1. Steam parameters:

H_2O heat of vaporization (non-condensate return):	1,178	Btu/lb
H_2O heat of vaporization (condensate return):	1,016	Btu/lb
Condensate return:	80%	

Table N-21. Utilities - Engines - Inventory Summary

Permit Unit Number	Model	Type	Number	Size	Unit
281	Cummins QSK19-G8	Backup/Standby Power Generator	1	600	kW
282	Kohler D111TIC	Backup/Standby Power Generator	1	200	kW
263	John Deere 4045HF285H	Backup/Standby Power Generator	1	83	kW
264	Cummins QSB7-G5 NR3	Backup/Standby Power Generator	1	150	kW
280	TBD(1)	Backup/Standby Power Generator	1	200	kW
290	Cummins QSB5-G5	Backup/Standby Power Generator	1	100	kW
203 and 204	Clarke JW6H-UFADF0	Fire Pump	2	399	hp

Pollutant	Potential Emissions per Engine, Cummins QSK19-G8 (tpy)	Potential Emissions per Engine, Kohler D111TIC (tpy)	Potential Emissions per Engine, Cummins (tpy)	Potential Emissions per Engine, Clarke (tpy)	Potential Emissions per Engine, TBD(1) (tpy)	Potential Emissions per Engine, Cummins QSB5-G5 (tpy)	Potential Emissions per Engine, John Deere (tpy)	Total Emissions (tpy)
CO	2.5E-01	3.3E-01	6.8E-02	1.8E-01	4.6E-01	5.0E-02	7.1E-02	1.582
NO_X	2.40	1.7E-01	5.1E-01	5.7E-01	0.49	3.7E-01	1.9E-01	5.267
VOC	5.3E-02	1.2E-01	7.1E-03	2.2E-02	4.0E-02	2.9E-03	8.2E-03	2.72E-01
SO_2	7.4E-04	4.5E-05	2.5E-04	3.1E-04	2.5E-04	1.4E-04	1.0E-04	2.14E-03
PM	2.1E-02	7.3E-04	8.9E-03	2.2E-02	2.6E-02	4.9E-03	9.3E-03	1.16E-01
PM_{10}	1.0E-02	7.3E-04	1.3E-02	2.2E-02	2.6E-02	4.9E-03	9.3E-03	1.08E-01
$PM_{2.5}$	1.0E-02	7.3E-04	1.3E-02	2.2E-02	2.6E-02	4.9E-03	9.3E-03	1.08E-01

Pollutant	Potential Emissions per Engine, Cummins QSK19-G8 (tpy)	Potential Emissions per Engine, Kohler D111TIC (tpy)	Potential Emissions per Engine, Cummins (tpy)	Potential Emissions per Engine, Clarke (tpy)	Potential Emissions per Engine, TBD(1) (tpy)	Potential Emissions per Engine, Cummins QSB5-G5 (tpy)	Potential Emissions per Engine, John Deere (tpy)	Total Emissions (tpy)
1,1,2,2-Tetrachloroethane	--	1.9E-06	--	--	--	--	--	1.9E-06
1,1,2-Trichloroethane	--	1.2E-06	--	--	--	--	--	1.2E-06
1,3-Butadiene	--	5.1E-05	--	--	--	--	--	5.1E-05
1,3-Dichloropropene	--	9.8E-07	--	--	--	--	--	9.8E-07
Acetaldehyde	1.3E-03	2.1E-04	4.5E-04	5.3E-04	4.3E-04	2.4E-04	1.8E-04	3.9E-03
Acrolein	1.6E-04	2.0E-04	5.5E-05	6.4E-05	5.2E-05	2.8E-05	2.2E-05	6.5E-04
Benzene	1.6E-03	1.2E-04	5.5E-04	6.5E-04	5.3E-04	2.9E-04	2.2E-04	4.6E-03
Carbon Tetrachloride	--	1.4E-06	--	--	--	--	--	1.4E-06
Chlorobenzene	--	9.9E-07	--	--	--	--	--	9.9E-07
Chloroform	--	1.1E-06	--	--	--	--	--	1.1E-06
Ethylbenzene	--	1.9E-06	--	--	--	--	--	1.9E-06
Ethylene Dibromide	--	1.6E-06	--	--	--	--	--	1.6E-06
Formaldehyde	2.0E-03	1.6E-03	7.0E-04	8.2E-04	6.6E-04	3.6E-04	2.8E-04	7.2E-03
Methanol	--	2.4E-04	--	--	--	--	--	2.4E-04
Methylene Chloride	--	3.2E-06	--	--	--	--	--	3.2E-06
Naphthalene	--	7.5E-06	--	--	--	--	--	7.5E-06
Polycyclic Aromatic Hydrocarbons (PAH)	2.8E-04	1.1E-05	9.9E-05	1.2E-04	9.5E-05	5.2E-05	4.0E-05	8.1E-04
Propylene	4.4E-03	--	1.5E-03	1.8E-03	1.5E-03	7.9E-04	6.2E-04	1.2E-02
Styrene	--	9.2E-07	--	--	--	--	--	9.2E-07
Toluene	6.9E-04	4.3E-05	2.4E-04	2.8E-04	2.3E-04	1.3E-04	9.8E-05	2.0E-03
Vinyl Chloride	--	5.5E-07	--	--	--	--	--	5.5E-07
Xylenes	4.8E-04	1.5E-05	1.7E-04	2.0E-04	1.6E-04	8.8E-05	6.8E-05	1.4E-03
Max HAP	***4.4E-03***	***1.6E-03***	***1.5E-03***	***1.8E-03***	***1.5E-03***	***7.9E-04***	***6.2E-04***	***1.2E-02***
Total HAPs	***1.1E-02***	***2.5E-03***	***3.8E-03***	***4.5E-03***	***3.6E-03***	***2.0E-03***	***1.5E-03***	***3.3E-02***

Table N-59. Soap Making C - Backup Generator

Source Designation	Engine	Generator
Date Manufactured	TBD	TBD
Manufacturer	Cummins	TBD
Model No.	QSB5-G5	TBD
Stroke Cycle[1]	4-Stroke	--
Fuel Used[1]	Diesel	--
Fuel Sulfur Content (%)[2]	0.0015	--
Rated Capacity (eKW)[1]	--	--
Calculated Horsepower (bhp)[1]	176	--
Generating Capacity (kW)[1,3]	131	100
Maximum Fuel Consumption at 100% Load (gal/hr)[1]	8.90	--
Heat Input (MMBtu/hr)[4]	1.23	--

Operational Detail	Value
Potential Annual Hours of Operation[5] (hr/yr):	500
Potential Fuel Consumption (Mgal/yr):	4.45

Pollutant	Emission Factors	Units	Notes
CO	5.20E-01	g/hp-hr	6
NO_X	3.84	g/hp-hr	6
HC	3.00E-02	g/hp-hr	6, 7
SO_2	3.08E-06	lb/hp-hr	8
PM	5.00E-02	g/hp-hr	6, 9
PM_{10}	5.00E-02	g/hp-hr	6, 9
$PM_{2.5}$	5.00E-02	g/hp-hr	6, 9

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (tpy)
CO	2.0E-01	5.0E-02
NO_x	1.49	3.7E-01
HC	1.2E-02	2.9E-03
SO_2	5.4E-04	1.4E-04
PM	1.9E-02	4.9E-03
PM_{10}	1.9E-02	4.9E-03
$PM_{2.5}$	1.9E-02	4.9E-03

Pollutant	Emission Factor (lb/MMBtu)[10]	Potential Emissions (lb/hr)	Potential Emissions (tpy)
Benzene	9.33E-04	1.1E-03	2.9E-04
Toluene	4.09E-04	5.0E-04	1.3E-04
Xylenes	2.85E-04	3.5E-04	8.8E-05
Propylene	2.58E-03	3.2E-03	7.9E-04
Formaldehyde	1.18E-03	1.5E-03	3.6E-04
Acetaldehyde	7.67E-04	9.4E-04	2.4E-04
Acrolein	9.25E-05	1.1E-04	2.8E-05
Polycyclic Aromatic Hydrocarbons (PAH)	1.68E-04	2.1E-04	5.2E-05
Max HAP		***3.2E-03***	***7.9E-04***
Total HAPs		***7.9E-03***	***2.0E-03***

1. Client specification of generator capacity and fuel.
2. Per 40 CFR 80 Subpart I, maximum sulfur content of ULSD is 15 ppm (i.e. 0.0015%).
3. Engine power calculated from horsepower assuming 0.7457 kW per horsepower.
4. To convert from bhp to MMBtu/hr, an average brake-specific fuel consumption of 7,000 Btu/hp-hr was used per AP-42 P-42 Section 3.3, Table 3.3-1 "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines," Supplement B, October 1996.
5. 500 hours used as projected potential to emit operating hours per EPA guidance. https://www.epa.gov/sites/production/files/2015-08/documents/emgen.pdf
6. Engine is Tier III certified. Emission factors from engine specification sheet, "Exhaust Emission Data Sheet C100D6C".
7. HC (Total Unburned Hydrocarbons) assumed to be equal to VOC. This conservatively over-estimates VOC by 70-90%, since not all HC are VOC.
8. SO_2 emission factors from AP-42 Section 3.3, Table 3.3-1 "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines," Supplement B, October 1996.
9. All particulates are assumed to be <1 micron in size, where PM, PM_{10}, and $PM_{2.5}$ are assumed to be equivalent, consistent with AP-42 Section 3.3, Table 3.3-1 "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines," Supplement B, October 1996.
10. Emission factors from AP-42 Section 3.3, Table 3.3-2 "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines."

Table N-28. Utilities - Ink Usage - Emissions

Business Unit	Case Printing Ink			Code Dater Ink			VOC Emissions[4]		HAP Emissions[4]	
	Annual Ink Usage[1] (lb/yr)	VOC Content[2] (%)	HAP Content[3] (%)	Annual Ink Usage[1] (lb/yr)	VOC Content[2] (%)	HAP Content[3] (%)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Soap Making Business A&B	8,300	10%	10%	--	--	--	9.5E-02	4.2E-01	9.5E-02	4.2E-01
Soap Making Business C	13,000	1%	1%	1,000	10%	10%	2.6E-02	1.2E-01	2.6E-02	1.2E-01
Consumer Cleaning Products A	8,625	1%	1%	--	--	--	9.8E-03	4.3E-02	9.8E-03	4.3E-02
Consumer Cleaning Products B-E	8,625	1%	1%	--	--	--	9.8E-03	4.3E-02	9.8E-03	4.3E-02
Customization	330	10%	10%	--	--	--	3.8E-03	1.7E-02	3.8E-03	1.7E-02
Total							1.44E-01	6.33E-01	1.44E-01	6.33E-01

1. Conservative assumption based on Procter and Gamble design data.
2. Conservatively determined ink VOC composition from vendor SDS, and assume that all VOC is lost to atmosphere (fugitive) during application.
3. Assumes all VOC in the ink is HAP. HAP is a glycol ether.
4. Ink usage based on annual total. Minor variations are expected in hourly usage based on production rate and print area.

Table N-29. Finished Product Packing Emissions from Hot Melt Glue

Business Unit	Annual Glue Usage[1] (lb/year)	VOC Emission Factor (lb/lb)	HAP Emission Factor (lb/lb)	VOC Emissions		HAP Emissions[2]	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)
Soap Making Business A&B	438,000	6.00E-04	2.00E-05	3.0E-02	1.3E-01	1.0E-03	4.4E-03
Consumer Cleaning Products A	250,080			1.7E-02	7.5E-02	5.7E-04	2.5E-03
Consumer Cleaning Products B-E	250,080			1.7E-02	7.5E-02	5.7E-04	2.5E-03
Customization	2,000			1.4E-04	6.0E-04	4.6E-06	2.0E-05
			Total:	6.4E-02	2.8E-01	2.1E-03	9.4E-03

1. Conservative assumption based on Procter and Gamble design data.
2. Conservatively assumed that all of the VOC in the hot melt glue is vinyl acetate.

ATTACHMENT P

Public Notice

AIR QUALITY PERMIT NOTICE

Notice of Application

Notice is given that the Procter & Gamble Manufacturing Company has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Class II Administrative Update to Construction Permit R13-3316D for a manufacturing operation located at 396 Development Drive, near Inwood in Berkeley County, West Virginia. The latitude and longitude coordinates are:

Latitude:	39° 24' 16.93" N	(39.404703)
Longitude:	78° 0' 28.66" W	(-78.007961)

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be: Particulate matter: 1.51 tons per year, Particulate matter less than 2.5 microns: 1.51 tons per year; Particulate matter less than 10 microns: 1.51 tons per year; Sulfur Dioxide: 0 tons per year; Oxides of Nitrogen: 0.38 tons per year; Carbon Monoxide: 0.05 tons per year; Volatile Organic Compounds: 0.19 tons per year; Hazardous Air Pollutants: 0.13 tons per year, including Glycol Ether (0.13 tons per year).

Startup of operation is planned to begin on or about the first day of April, 2018. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours.

Dated this the 1st day of March, 2018

By:
The Procter & Gamble Manufacturing Company
Francisco Lanza
Manufacturing Capability Associate Director
Sharon Woods Innovation Center
A2M 11-3
11510 Reed Hartman Highway
Cincinnati, OH 45241

ATTACHMENT

Strike Through Permit

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

December 19, 2017

Francisco Lanza
The Proctor and Gamble Company
Sharon Woods Innovation Center
A2M11-3
11510 Reed Hartman Highway
Cincinnati, Oh 45241

Re: Procter & Gamble
Tabler Station Facility
Permit No. R13-3316D
Plant ID No. 003-00154

Dear Mr. Lanza:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-3316C is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

In accordance with 45CSR22 - Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the Certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

Enclosures

c: Drew Hadley, P&G
EPRO

West Virginia Department of Environmental Protection
Division of Air Quality

Jim Justice
Governor

Austin Caperton
Cabinet Secretary

Permit to Update

R13-3316D

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Procter and Gamble Manufacturing Company
Tabler Station Facility
003-00154

William F. Durham
Director

Issued: December 19, 2017

Facility Location:	Inwood, Berkeley County, West Virginia
Mailing Address:	Sharon Woods Innovation Center A2M11-3 11510 Reed Hartman Highway Cincinnati, OH 45241
Facility Description:	Consumer products manufacturing facility
NAICS Codes:	325612, 325613, 325620
UTM Coordinates:	757.0 km Easting • 4,366.0 km Northing • Zone 17
Permit Type:	Class II administrative update

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

This permit does not affect 45CSR30 applicability, the source is a nonmajor source subject to 45CSR30.

Table of Contents

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1E	Surfactant Making Process	2017	3,000 gal/hr	1C
2S	2E	Surfactant Making Process	2017	3,000 gal/hr	2C
3S	3E	Surfactant Tank	2017	120,762 gal	N
4S	4E	Surfactant Tank	2017	48,345 gal	N
5S	5E	Surfactant Tank	2017	40, 109 gal	N
6S	6E	Surfactant Tank	2017	40, 109 gal	N
7S	7E	Surfactant Tank	2017	15,125 gal	N
8S	8E	Surfactant Tank	2017	15,125 gal	N
9S	9E	Surfactant Tank	2017	15,125 gal	N
10S	10E	Surfactant Tank	2017	72,475 gal	N
11S	11E	Surfactant Tank	2017	72,475 gal	N
12S	12E	Surfactant Tank	2017	72,475 gal	N
13S	13E	Surfactant Tank	2017	72,475 gal	N
14S	14E	Surfactant Tank	2017	72,475 gal	N
15S	15E	Surfactant Tank	2017	72,475 gal	N
16S	16E	Surfactant Tank	2017	26,083 gal	N
17S	17E	Surfactant Tank	2017	15,125 gal	N
18S	18E	Surfactant Tank	2017	15,125 gal	N
19S	19E	Surfactant Bulk Liquid Transfer	2018	4,669,701 gal/yr	N
20S	20E	Liquid Soap A & B Tank	2017	79,252 gal	N
21S	21E	Liquid Soap A & B Tank	2017	79,252 gal	N
22S	22E	Liquid Soap A & B Tank	2017	79,252 gal	N
23S	23E	Liquid Soap A & B Tank	2017	7,925 gal	N
24S	24E	Liquid Soap A & B Tank	2017	7,925 gal	N
25S	25E	Liquid Soap A & B Tank	2017	39,626 gal	N
26S	26E	Liquid Soap A & B Tank	2017	15,850 gal	N
27S	27E	Liquid Soap A & B Tank	2017	39,626 gal	N
28S	28E	Liquid Soap A & B Tank	2017	26,417 gal	N
29S	29E	Liquid Soap A & B Tank	2017	15,850 gal	N
30S	30E	Liquid Soap A & B Tank	2017	26,417 gal	N
31S	31E	Liquid Soap A & B Tank	2017	15,850 gal	N

1.0 Emission Units

32S	32E	Liquid Soap A & B Tank	2017	15,850 gal	N
33S	33E	Liquid Soap A & B Tank	2017	7,925 gal	N
34S	34E	Liquid Soap A & B Tank	2017	7,925 gal	N
35S	35E	Liquid Soap A & B Tank	2017	7,925 gal	N
36S	36E	Liquid Soap A & B Tank	2017	7,925 gal	N
37S	37E	Liquid Soap A & B Tank	2017	7,925 gal	N
38S	38E	Liquid Soap A & B Tank	2017	396 gal	N
40S	40E	Liquid Soap A & B Tank	2017	396 gal	N
41S	41E	Liquid Soap A & B Tank	2017	396 gal	N
42S	42E	Liquid Soap A & B Tank	2017	396 gal	N
43S	43E	Liquid Soap A & B Tank	2017	396 gal	N
44S	44E	Liquid Soap A & B Tank	2017	396 gal	N
45S	45E	Liquid Soap A & B Tank	2017	396 gal	N
46S	46E	Liquid Soap A & B Tank	2017	396 gal	N
47S	47E	Liquid Soap A & B Tank	2017	396 gal	N
50S	50E	Liquid Soap A & B Tank	2017	7,925 gal	N
51S	51E	Liquid Soap A & B Tank	2017	396 gal	N
52S	52E	Liquid Soap A & B Tank	2017	396 gal	N
53S	53E	Liquid Soap A & B Tank	2017	7,925 gal	N
54S	54E	Liquid Soap A & B Tank	2017	660 gal	N
55S	55E	Liquid Soap A & B Tank	2017	396 gal	N
56S	56E	Liquid Soap A & B Tank	2017	7,275 gal	N
57S	57E	Liquid Soap A & B Tank	2017	1,057 gal	N
59S	59E	Liquid Soap A & B Tank	2017	396 gal	N
60S	60E	Liquid Soap A & B Tank	2017	132 gal	N
61S	61E	Liquid Soap A & B Tank	2017	396 gal	N
63S	63E	Liquid Soap A & B Tank	2017	396 gal	N
64S	64E	Liquid Soap A & B Tank	2017	396 gal	N
65S	65E	Liquid Soap A & B Tank	2017	396 gal	N
66S	66E	Liquid Soap A & B Tank	2017	396 gal	N
67S	67E	Liquid Soap A & B Tank	2017	396 gal	N
68S	68E	Liquid Soap A & B Tank	2017	396 gal	N
69S	69E	Liquid Soap A & B Tank	2017	396 gal	N

1.0 Emission Units

70S	70E	Liquid Soap A & B Tank	2017	396 gal	N
71S	71E	Liquid Soap A & B Tank	2017	396 gal	N
72S	72E	Liquid Soap A & B Tank	2017	396 gal	N
73S	73E	Liquid Soap A & B Tank	2017	396 gal	N
74S	74E	Liquid Soap A & B Tank	2017	396 gal	N
75S	75E	Liquid Soap A & B Tank	2017	396 gal	N
76S	76E	Liquid Soap A & B Tank	2017	396 gal	N
77S	77E	Liquid Soap A & B Tank	2017	396 gal	N
87S	87E	Liquid Soap A & B Tank	2017	1,585 gal	N
88S	88E	Liquid Soap A & B Tank	2017	1,585 gal	N
89S	89E	Liquid Soap A & B Tank	2017	1,585 gal	N
90S	90E	Liquid Soap A & B Tank	2017	1,585 gal	N
91S	91E	Liquid Soap A & B Tank	2017	1,585 gal	N
92S	92E	Liquid Soap A & B Tank	2017	1,585 gal	N
93S	93E	Liquid Soap A & B Tank	2017	1,585 gal	N
94S	94E	Liquid Soap A & B Tank	2017	1,585 gal	N
94bS	94bE	Liquid Soap A & B Tank	2017	1,585 gal	N
94cS	94cE	Liquid Soap A & B Tank	2017	1,585 gal	N
94dS	94dE	Liquid Soap A & B Tank	2017	1,585 gal	N
94eS	94eE	Liquid Soap A & B Tank	2017	1,585 gal	N
95S	95E	Liquid Soap A & B Tank	2017	1,585 gal	N
96S	96E	Liquid Soap A & B Tank	2017	1,585 gal	N
97S	97E	Liquid Soap A & B Tank	2017	1,585 gal	N
98S	98E	Liquid Soap A & B Tank	2017	1,585 gal	N
99S	99E	Liquid Soap A & B Tank	2017	1,585 gal	N
100S	100E	Liquid Soap A & B Tank	2017	1,585 gal	N
101S	101E	Liquid Soap A & B Tank	2017	1,585 gal	N
102S	102E	Liquid Soap A & B Tank	2017	1,585 gal	N
103S	103E	Liquid Soap A & B Tank	2017	1,585 gal	N
104S	104E	Liquid Soap A & B Tank	2017	1,585 gal	N
105S	105E	Liquid Soap A & B Tank	2017	1,585 gal	N
106S	106E	Liquid Soap A & B Tank	2017	1,585 gal	N
107S	107E	Liquid Soap A & B Tank	2017	1,585 gal	N

1.0 Emission Units

108S	108E	Liquid Soap A & B Tank	2017	1,585 gal	N
109S	109E	Liquid Soap A & B Tank	2017	1,585 gal	N
110S	110E	Liquid Soap A & B Tank	2017	1,585 gal	N
111S	111E	Liquid Soap A & B Tank	2017	1,585 gal	N
112S	112E	Liquid Soap A & B Tank	2017	1,585 gal	N
113S	113E	Liquid Soap A & B Tank	2017	1,585 gal	N
114S	114E	Liquid Soap A & B Tank	2017	1,585 gal	N
115S	115E	Liquid Soap A & B Tank	2017	1,585 gal	N
116S	116E	Liquid Soap A & B Tank	2017	1,585 gal	N
117S	117E	Liquid Soap A & B Tank	2017	1,585 gal	N
118S	118E	Liquid Soap A & B Tank	2017	1,585 gal	N
259S	228E	Liquid Soap A & B Tank	2017	79,252 gal	N
260S	229E	Liquid Soap A & B Tank	2017	79,252 gal	N
261S	230E	Liquid Soap A & B Tank	2017	79,252 gal	N
119S	119E	Liquid Soap A & B Packing/Filling	2017	139,798,617 gal/yr	N
120S	120E	Mixer	2017	1,182.6 mmscf/yr	3C
121S		Mixer	2017		
122S		Premix Tank	2017		
123S		Premix Tank	2017		
124S	121E	Mixer	2017	2,496.6 mmscf/yr	4C
125S		Process Tank	2017		
126S		Process Tank	2017		
127S		Process Tank	2017		
128S	122E	Mixer	2017	2,496.6 mmscf/yr	5C
129S		Process Tank	2017		
130S		Process Tank	2017		
131S		Process Tank	2017		
132S	123E	Mixer	2017	1,655.64 mmscf/yr	6C
133S		Process Tank	2017		
134S		Process Tank	2017		
135S		Process Tank	2017		
136S	124E	Preweigh Station	2017	525.6 mmscf/yr	7C
137S		Preweigh Station	2017		
138S		Preweigh Station	2017		

1.0 Emission Units

139S		Preweigh Station	2017		
140S	125E	Preweigh Station	2017	525.6 mmscf/yr	8C
141S		Preweigh Station	2017		
142S		Preweigh Station	2017		
143S		Preweigh Station	2017		
144S		Sampling Station	2017		
145S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
146S	127E	Mixer	2017	918.8 mmscf/yr	9C
147S		Process Tank	2017		
148S		Process Tank	2017		
149S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
150S	128E	Mixer	2017	918.8 mmscf/yr	10C
151S		Process Tank	2017		
152S		Process Tank	2017		
153S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
154S	129E	Mixer	2017	918.8 mmscf/yr	11C
155S		Process Tank	2017		
156S		Process Tank	2017		
157S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
158S	130E	Mixer	2017	1603.08 mmscf/yr	12C
159S		Process Tank	2017		
160S		Process Tank	2017		
161S	131E	Process Tank	2017	735.84 mmscf/yr	13C
162S		Process Tank	2017		
163S	132E	Dry Consumer Product Tank	2017	42,879 gal	N
164S	133E	Dry Consumer Product Tank	2017	37,641 gal	N
165S	134E	Dry Consumer Product Tank	2017	6,809 gal	N
166S	135E	Dry Consumer Product Tank	2017	396 gal	N
167S	136E	Dry Consumer Product Tank	2017	396 gal	N
168S	137E	Dry Consumer Product Tank	2017	396 gal	N
169S	138E	Dry Consumer Product Tank	2017	181 gal	N
170S	139E	Dry Consumer Product Tank	2017	181 gal	N
171S	140E	Dry Consumer Product Tank	2017	181 gal	N
172S	141E	Dry Consumer Product Tank	2017	181 gal	N

1.0 Emission Units

173S	142E	Dry Consumer Product Tank	2017	181 gal	N
174S	143E	Dry Consumer Product Tank	2017	181 gal	N
175S	144E	Dry Consumer Product Tank	2017	181 gal	N
176S	145E	Dry Consumer Product Tank	2017	181 gal	N
177S	146E	Dry Consumer Product Tank	2017	181 gal	N
178S	147E	Dry Consumer Product Tank	2017	181 gal	N
179S	148E	Dry Consumer Product Tank	2017	181 gal	N
180S	149E	Dry Consumer Product Tank	2017	181 gal	N
262S	232E	Flexible Perfume Delivery System	2017	30 gal	N
189S	158E	Dry Consumer Product PM Control	2017	17, 450 scfm	15C
190S	159E	Dry Consumer Product PM Control	2017	17, 450 scfm	16C
191S	160E	Dry Consumer Product PM Control	2017	17, 450 scfm	17C
192S	161E	Dry Consumer Product PM Control	2017	17, 450 scfm	18C
193S	162E	Dry Consumer Product PM Control	2017	17, 450 scfm	19C
194S	163E	Dry Consumer Product PM Control	2017	8,000 scfm	20C
195S	164E	Dry Consumer Product Additive	2017	109 ft/s	N
196S	165E	Boiler 1	2017	62 mmbtu/hr	N
197S	166E	Boiler 2	2017	62 mmbtu/hr	N
198S	167E	Boiler 3	2017	33 mmbtu/hr	N
199S	168E	Temporary Boiler	2017	11 mmbtu/hr	N
200S	169E	Cooling Tower	2017	331 mgal/hr	N
201S	170E	Cooling Tower	2017	792 mgal/hr	N
202S	171E	Cooling Tower	2017	212 mgal/hr	N
203S	172E	Fire Pump Engine	2017	399 hp	N
204S	173E	Fire Pump Engine	2017	399 hp	N
263S	233E	Emergency Generator	2017	83 kw	N
264S	234E	Emergency Generator	2017	150 kw	N
208S	177E	Fuel Tank	2017	5,162 gal	N
210S	179E	Warehouse Heaters	2017	18.3 mmbtu/hr (total)	N
216S	185E	VOC containing Water/waste-water Pretreatment Chemicals	2017	174,928 kg/yr	N
217S	186E	Plastic Pellet Unloading	2017	100,000 tons/yr	21C
218S	187E	Plastic Pellet Unloading	2017		22C
219S	188E	Plastic Pellet Unloading	2017		23C

1.0 Emission Units

220S	189E	Plastic Pellet Unloading	2017		24C
221S	190E	Plastic Pellet Unloading	2017		25C
222S	191E	Plastic Resin Storage Silo	2017		N
223S	192E	Plastic Resin Storage Silo	2017		N
224S	193E	Plastic Resin Storage Silo	2017		N
225S	194E	Plastic Resin Storage Silo	2017		N
226S	195E	Plastic Resin Storage Silo	2017		N
227S	196E	Plastic Resin Storage Silo	2017		N
228S	197E	Plastic Resin Storage Silo	2017		N
229S	198E	Plastic Resin Storage Silo	2017		N
230S	199E	Plastic Resin Storage Silo	2017		N
231S	200E	Plastic Resin Storage Silo	2017		N
232S	201E	Plastic Resin Storage Silo	2017		N
233S	202E	Plastic Resin Storage Silo	2017	100,000 tons/yr	N
234S	203E	Plastic Resin Storage Silo	2017		N
235S	204E	Plastic Resin Storage Silo	2017		N
236S	205E	Plastic Resin Storage Silo	2017		N
237S	206E	Plastic Resin Storage Silo	2017		N
238S	207E	Plastic Resin Storage Silo	2017		N
239S	208E	Plastic Resin Storage Silo	2017		N
240S	209E	Plastic Resin Storage Silo	2017		N
241S	210E	Plastic Resin Storage Silo	2017		N
242S	211E	Plastic Resin Storage Silo	2017		N
243S	212E	Plastic Resin Storage Silo	2017		N
244S	213E	Plastic Resin Storage Silo	2017		N
245S	214E	Plastic Resin Storage Silo	2017		N
246S	215E	Plastic Regrind	2017	32,000 tons/yr	26C
247S	216E	Plastic Forming	2017	100,000 tons/yr	N
248S	217E	Plastics Molding, Cleaning Fugitives	2017	6 tons/yr	N
249S	218E	Plastics Molding Space Heaters	2017	17 mmbtu/hr total	N
255S	224E	Plastics Molding Cooling Tower	2017	7,000 gpm	N
256S	225E	Plastics Mold. Emergency Gen.	2017	100 kw	N
257S	226E	Case Printing Ink	2018	1,255 lb/yr	N

39,880 lb/yr

940,161 lb/yr

1.0 Emission Units

258S	227E	Case Packing Glue	2017	690,080 lb/yr	N
265S	235E	Surfactant Tank	2018	120,762 gal	N
266S	236E	Surfactant Tank	2018	40,109 gal	N
267S	237E	Surfactant Tank	2018	120,762 gal	N
268S	238E	Mixing Tank	2018	32,315,255 gal/yr	N
269S	239E	Surfact. Phase 2 Truck & Rail Loadout	2018	7,968,239 gal/yr	N
270S	240E	Liquid Soap C Tank	2018	16,138 gal	N
271S	241E	Liquid Soap C Tank	2018	16,138 gal	N
272S	242E	Liquid Soap C Tank	2018	16,138 gal	N
273S	243E	Liquid Soap C Tank	2018	16,138 gal	N
274S	244E	Liquid Soap C Tank	2018	396 gal	N
275S	245E	Liquid Soap C Tank	2018	549 gal	N
273S	246E	Liquid Soap C Tank	2018	549 gal	N
277S	247E	Liquid Soap C Pack and Cap	2018	130,000,000 gal/yr	N
278S	248E	Liquid Soap C Bulk Truck Loadout	2018	2,000,000 gal/yr	N
279S	249E	Dry Material Loadout	2018	31,867,159 lb/yr	N
280S	250E	Emergency Generator	2018	200 kW	N
281S	251E	Emergency Generator	2018	600kW	N
282S	252E	Emergency Generator	2018	200 kW	N
283S	253E	Cooling Tower	2018	17,000 gal/hr	N
284S	254E	CCP B-E Tank	2018	170 gal	N
285S	255E	CCP B-E Tank	2018	170 gal	N
286S	256E	CCP B-E Tank	2018	170 gal	N
287S	257E	CCP B-E Tank	2018	170 gal	N
288S	258E	CCP B-E Baghouse	2018	4,000 scfm	N
289S	259E	Converting Operations Vent	2018	n/a	N
290S	260E	Emergency Generator	2018	100 kW	N

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments
CBI	Confidential Business Information
CEM	Continuous Emission Monitor
CES	Certified Emission Statement
C.F.R. *or* CFR	Code of Federal Regulations
CO	Carbon Monoxide
C.S.R. *or* CSR	Codes of State Rules
DAQ	Division of Air Quality
DEP	Department of Environmental Protection
dscm	Dry Standard Cubic Meter
FOIA	Freedom of Information Act
HAP	Hazardous Air Pollutant
HON	Hazardous Organic NESHAP
HP	Horsepower
lbs/hr	Pounds per Hour
LDAR	Leak Detection and Repair
M	Thousand
MACT	Maximum Achievable Control Technology
MDHI	Maximum Design Heat Input
MM	Million
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAPS	National Emissions Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter less than 2.5μm in diameter
PM_{10}	Particulate Matter less than 10μm in diameter
Ppb	Pounds per Batch
pph	Pounds per Hour
ppm	Parts per Million
Ppmv or ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulate
USEPA	United States Environmental Protection Agency
UTM	Universal Transverse Mercator
VEE	Visual Emissions Evaluation
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquids

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

2.4.1. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3316 R13-3316A, R13-3316B, R13-3316C and R13-3316D and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1]**

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and

any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345
DAQ Compliance & Enforcement[1]
DEPAirQualityReports@wv.gov
[1]For All self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status Reports, Initial Notifications, etc.

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee.**

3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspectio n by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1 The Procter & Gamble Manufacturing Company, Tabler Station Facility shall consist of only the pollutant-emitting equipment and processes identified under Section 1.0 of this permit and any other processes/units defined as De Minimis per 45CSR13. In accordance with the information filed in Permit Application R13-3316, R13-3316A, R13-3316B, R13-3316C and R13-3316D, the equipment shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants and the equipment/processes shall use the specified control devices.

4.1.2. Emissions from the facility shall not exceed the following:

See Attached Table for Changes to 4.1.2

	NO_x		SO_2		VOC		PM		CO	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Scrubber Stacks[1]	1.06	4.66	2.10	1.41	1.80	4.13	6.9	21.70	0.06	0.24
Surfactant Startup Preheater	0.78	0.03	0.01	0.01	0.09	0.01	0.12	0.01	1.30	0.05
Surfactant Manufact. Tanks	--	--	--	--	0.35	1.54	--	--	--	--
Truck and Rail Loading[2]	--	--	--	--	0.01	0.06	--	--	--	--
Liq. Soap A and B Outdoor Tanks	--	--	--	--	0.24	1.70	--	--	--	--
Liq. Soap A and B Indoor Tanks	--	--	--	--	0.17	0.76	--	--	--	--
Liq. Soap C Tanks	--	--	--	--	0.13	0.55	0.01	0.01	--	--
Liq Soap Packing & Capping	--	--	--	--	0.01	0.01	--	--	--	--
Liq. Soap C Packing & Capping	--	--	--	--	0.40	1.75	--	--	--	--
Liq. Soap C Truck Loading	--	--	--	--	0.15	0.65	--	--	--	--
Rotoclones & Liq. Soap Fug.	--	--	--	--	33.23	33.42	4.57	20.06	--	--
Liquid Soap RTO[3]	0.24	1.10	0.01	0.01	213.50	8.00	0.02	0.07	1.30	5.80
Dry Cons. Prod Manuf. Out. Tanks	--	--	--	--	0.07	0.31	--	--	--	--
Dry Cons. Prod Manuf. In. Tanks	--	--	--	--	0.62	0.76	--	--	--	--
Dry Cons. Prod. Baghouses/Fab. Filters	--	--	--	--	--	--	3.81	16.71	--	--
Dry Cons. Prod Manufact. Fugitives	--	--	--	--	2.0	8.70	--	--	--	--
Main Facility Boilers	11.31	49.54	0.10	0.41	0.56	2.46	1.17	5.14	5.78	25.33
Main Facility Cooling Towers	--	--	--	--	--	--	1.35	5.90	--	--
Main Facility Engines	19.56	4.89	0.04	0.01	1.08	0.27	0.44	0.11	6.12	1.53
Main Facility Process Heaters	0.90	3.90	0.02	0.05	0.10	0.44	0.14	0.60	1.51	6.60
Water/Waste water Treatment	--	--	--	--	2.99	13.04	--	--	--	--
Case Print. Ink & Case Pack. Glue Use	--	--	--	--	0.18	0.80	--	--	--	--
Plastics Molding Cyclones	--	--	--	--	--	--	0.29	0.35	--	--
Plastics Moldings Silos	--	--	--	--	--	--	2.91	3.50	--	--
Plastic Regrind	--	--	--	--	--	--	0.04	0.17	--	--
Plastic Molding Fugitives	--	--	--	--	2.07	9.07	--	--	--	--
Plastic Molding Space Heat.	0.83	3.65	0.01	0.04	0.10	0.41	0.13	0.56	1.40	6.13
Plastic Molding Cool. Tower	--	--	--	--	--	--	0.42	1.84	--	--

Plastic Molding Engines	0.01	0.01	0.01	0.01	0.06	0.01	0.01	0.01	0.02	0.01
Cooling Tower 253E	--	--	--	--	--	--	0.02	0.08	--	--
De Minimis Sources (Low VOC tanks)	--	--	--	--	0.20	1.0	--	--	--	--
Total	**34.69**	**67.78**	**2.30**	**1.95**	**260.11**	**89.85**	**22.35**	**76.82**	**17.49**	**45.69**

[1]Surfactant startup preheaters vent to scrubber stacks. Emissions are additive to surfactant scrubber emissions.
[2]Less than 0.001 lb/hr potential particulate emissions from surfactant unloading.
[3]Maximum hourly VOC emissions of 213.5 lb/hr (less than 24 hours per year). Maximum hourly VOC controlled emissions of 6.4 lb/hr.

4.1.3 The permittee shall maintain the pH of the scrubbing liquor to a level at least as alkaline as it was during the most recent test which showed compliance with the emission levels of 4.1.1.

4.1.4 Each surfactant startup preheater shall not operate more than 72 hours per year.

4.1.5 All process tanks for Liquid Soap A and B manufacturing which incorporate dust control systems shall be equipped with rotoclones for emission control. Said rotolclones shall be designed, installed, operated and maintained so as to achieve emissions outlined in 4.1.2.

4.1.6 All hot mixing vessels for Liquid Soap A shall be equipped with an RTO to be operated anytime the mixing process uses the heated volatile processing aid. Said RTO shall be designed, installed, operated and maintained so as to achieve a minimum destruction efficiency of at least 97%. Operation of the hot mixing process vessels using the heated volatile processing aid without RTO shall be maintained at less than 24 hours per year.

4.1.7 The Dry Consumer Laundry and Cleaning Products area shall be equipped with fabric filters to control particulate emissions.

4.1.8 Boiler Nos. 1 and 2 shall not exceed a heat input of 62 mmbtu/hr each. Boiler No. 3 shall not exceed a heat input of 33 mmbtu/hr. All boilers shall be fired exclusively with pipeline quality natural gas.

4.1.9 Boiler Nos. 1 and 2 shall not consume more than 543 mmscf of fuel per year each. Boiler No.3 shall not consume more than 286 mmscf of fuel per year.

4.1.10 Visible emissions from any boiler shall not exceed 10% opacity based on a six minute block average. **[45CSR§2-3.1.]**

4.1.11 The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup of the natural gas fired boilers, as provided by §60.7 of this part. **[40 CFR §60.48c(a)]**

4.1.12 The cooling towers shall be operated with a drift rate of no more than 0.002%. Additionally, the total dissolved solids (TDS) content of the cooling tower water shall not exceed 6,000 ppm.

4.1.13 The four emergency generators (263S, 264S, 280S and 281S) and fire water pump engines (203S and 204S) shall fire only ultra low sulfur diesel fuel with a sulfur content of no greater than 0.0015% by weight.

five

290S

4.1.14 The Kohler/John Deere emergency generator (263S) shall not consume more than 6.9 gallons of fuel oil per hour.

4.1.14.1 The emergency generators 264S and 280S shall not consume more than 17.12 gallons of fuel oil each per hour.

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290S

4.1.14.2 The Cummins emergency generator (281S) shall not consume more than 45 gallons of fuel oil per hour.

4.1.15 Each of the two Clark fire pump engines (203S and 204S) shall not consume more than 16.13 gallons per hour.

20 gal/hr

4.1.16 The 4 stroke rich burn emergency generator (256S) shall fire only pipeline quality natural gas. Said engine shall not consume more than 1,116 scf per hour of natural gas.

4.1.16.1 The Kohler 4-strok rich burn emergency generator (282S) shall fire only pipeline quality natural gas. Said engine shall not consume more than 2,115 scf per hour of natural gas.

4.1.17. Emissions from the emergency generators and fire water pump engines shall not exceed the following (all limits in g/kW-hr, unless otherwise noted):
[40 CFR §60.4205]

290S will have same limits as 264S and 280S

Engine	NMHC + NO_x	CO	PM
Fire Water Pump Engine (203)	4.0	--	0.20
Fire Water Pump Engine (204)	4.0	--	0.20
Emergency Generator (256)	2g/hp-hr (NO_x) 1g/hp-hr (VOC)	4 g/hp-hr	--
Emergency Generator (263)	4.0	5.0	0.30
Emergency Generator (264)	4.0	3.5	0.20
Emergency Generator (280)	4.0	3.5	0.20
Emergency Generator (281)	6.4	3.5	0.20
Emergency Generator (282)	2g/hp-hr (NO_x) 1g/hp-hr (VOC)	4 g/hp-hr	--

4.1.18.1 Compliance with the above limits shall be determined by purchasing certified engines.
[40 CFR §60.4211(c)]

4.1.19 The emergency generators (263S, 264S, 280S and 281S) and fire pump engines (203S and 204S) shall fire only nonroad diesel fuel that meets the requirements of 40 CFR 80.510(b).
[40 CFR §60.4207(b)]

290S

4.1.20 The emergency generators (263S, 264S, 280S and 281S) and fire pump engines (203S and 204S) must meet all applicable requirements of 40 CFR 60 Subpart IIII.
[40 CFR §63.6590(c)(1)]

290S

4.1.21 The emergency generators (256S and 282S) must meet all applicable requirements of 40 CFR 60 Subpart JJJJ.
[40 CFR §63.6590(c)(1)]

4.1.22 Cyclones shall be used to control PM emissions from rail car unloading of pellets to the rail car unloading feeder. Said cyclones shall be designed, installed, operated and maintained so as to achieve the Plastics Molding Cyclone emission rate of 4.1.2.

4.1.23 The total amount of pellets unloaded into the 24 plastics molding silos combined shall not exceed 100,000 tons per year.

4.1.24 PM emissions from the plastic regrind process shall be controlled with a bin vent filter. Said filter shall be designed, installed, operated and maintained so as to achieve the plastic regrind emission rate of 4.1.2.

4.1.25 The total amount of pellets reground shall not exceed 32,000 tons per year.

4.1.26. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0

and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Testing Requirements

4.2.1. In order to determine compliance with the SO_2, VOC and PM scrubber stack emission limitations of 4.1.2 of this permit, the permittee shall perform EPA approved stack testing on each scrubber stack within 180 days of startup. Said testing shall utilize EPA approved methods unless otherwise approved by the Director.

4.2.2 In order to determine compliance with the VOC RTO emission limitations of 4.1.2 of this permit, the permittee shall perform EPA approved stack testing on the RTO stack within 180 days of startup. Said testing shall utilize EPA approved methods unless otherwise approved by the Director.

4.2.3 The testing required under conditions 4.2.1 and 4.2.2 of this permit shall be repeated at least once every 5 years.

4.2.4 In order to determine compliance with the opacity limits of 4.1.10 of this permit, the permittee shall conduct visible emission checks and / or opacity monitoring and recordkeeping for each boiler stack.

a. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

b. Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Each observation must be recorded as either visible emissions observed or no visible emissions observed. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

c. If visible emissions are present at a source(s) the permittee shall perform Method 9 readings to confirm that visible emissions are within the limits of 4.1.10 of this permit. Said Method 9 readings shall be taken as soon as practicable, but within seventy-two (72) hours of the Method 22 emission check.

d. If, one year of monthly Method 22 readings show that there are no visible emissions, then the frequency of observations can be reduced to quarterly. If, during quarterly checks, visible emissions are observed, then the frequency of observations shall be returned to monthly.

4.2.5 At least once a month, the permittee shall take a grab sample of the cooling tower circulating water from each cooling tower and verify the total dissolved solids content as limited under 4.1.12of this permit. If one year of monitoring indicates less than 80% of the levels of 4.1.12 are maintained, then the frequency of sampling of cooling tower circulating water can be reduced to quarterly. If, during quarterly sampling, greater than 80% of the levels of 4.1.12 are measured, the frequency of sampling shall be returned to monthly.

4.3. Monitoring and Recordkeeping Requirements

4.3.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

4.3.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.3.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.3.4. In order to determine compliance with 4.1.3 of this permit, Procter and Gamble shall monitor and record the pH of the scrubber liquor on at least an hourly basis.

4.3.5 In order to determine compliance with 4.1.4 of this permit, Procter and Gamble shall monitor and record the annual hours of operation of each surfactant startup preheater.

4.3.6 In order to determine compliance with the tank VOC emission limits of 4.1.2, Procter and Gamble shall monitor and record the substance (and its associated vapor pressure) stored in each storage tank.

4.3.7 In order to determine compliance 4.1.5 and with the rotoclone emission limits of 4.1.2, Procter and Gamble shall monitor and record the pressure drop across each rotoclone on at least a monthly basis.

4.3.8 In order to determine compliance with the rotoclone and fugitive emissions limit of 4.1.2, the throughput of volatile processing aid shall be monitored and recorded on at least a monthly basis.

4.3.9 In order to determine compliance with the RTO emission limits of 4.1.2 and the control efficiency requirement of 4.1.6, Procter and Gamble shall monitor and record the internal temperature of the RTO (when the RTO is in use) on at least an hourly basis and shall track all hours of operation with volatile processing aid when the RTO is not in use.

4.3.10 In order to determine compliance with the dry consumer product baghouse emission limits of 4.1.2, Procter and Gamble shall monitor and record the pressure drop across each baghouse on at least a weekly basis.

4.3.11 In order to determine compliance with the dry consumer products A fugitive emission limits of 4.1.2, Procter and Gamble shall monitor and record the vapor pressure of any additive used and the area of the coated substrate (as measured from the point of application until the substrate is wound for storage).

4.3.12 In order to determine compliance with the boiler emission limits of 4.1.2 and the operational limits of 4.1.8 and 4.1.9, Procter and Gamble shall monitor and record the amount and type of fuel consumed by each boiler on at least a monthly basis.

4.3.13 In order to determine compliance with the cooling tower emission limits of 4.1.2 and the operational limits of 4.1.12, Procter and Gamble shall monitor and record the TDS content of the cooling tower water (via either conductivity or lab testing) on at least a monthly basis. If one year of monitoring indicates less than 80% of the levels of 4.1.12 are maintained, then the frequency of sampling of the cooling tower circulating water can be reduced to quarterly. If, during quarterly sampling, greater than 80% of the levels of 4.1.12 are measured, the frequency of sampling shall be returned to monthly.

4.3.14 In order to determine compliance with all Reciprocating Internal Combustion Engine (RICE) emission limits of 4.1.2 and the operational limits of 4.1.13through 4.1.21, Procter and Gamble shall monitor and record the number of hours of operation of each RICE on at least a monthly basis, the type and amount of fuel consumed by each RICE on at least a monthly basis, and the sulfur content of any fuel oil consumed by any RICE.

4.3.15 In order to determine compliance with the water/waste water treatment emission limits of 4.1.2 Procter and Gamble shall monitor and record the type, amount, VOC and HAP content of any water/ waste water pretreatment chemicals used.

4.3.16 In order to determine compliance with the case packer ink and case packer glue emission limits of 4.1.2, Procter and Gamble shall monitor and record the amount of ink and glue used that contains any VOC or HAP at the facility on at least a monthly basis.

4.3.17 In order to determine compliance with the plastic molding cyclone emission limits of 4.1.2, Procter and Gamble shall monitor and record the pressure drop across each cyclone on at least a monthly basis.

4.3.18 In order to determine compliance with the plastic molding silo emission limits of 4.1.2 and the operational limits of 4.1.23, Procter and Gamble shall monitor and record the amount of plastic pellets transferred to the storage silo on at least a monthly basis.

4.3.19 In order to determine compliance with the plastic regrind process emission limits of 4.1.2, Procter and Gamble shall monitor and record the pressure drop across the bin vent filter on at least a monthly basis. Additionally, Procter and Gamble shall monitor and record the total amount of pellets reground on at least a monthly basis.

4.3.20 In order to determine compliance with the plastic molding fugitive emission limits of 4.1.2, Procter and Gamble shall monitor and record the amount of volatile solvents used for plastics molding process cleaning purposes on at least a monthly basis.

4.4. Reporting Requirements

4.4.1. The permittee shall submit any and all applicable notifications and reports required under 40 CFR 60 Subpart IIII.
[40CFR §60.4214]

4.4.2 The permittee shall submit any and all applicable notifications and reports required under 40 CFR 60 Subpart JJJJ.
[40CFR §60.4245]

4.4.3 The permittee shall submit any and all applicable notifications and reports required under 40 CFR 60 Subpart Dc.
[40 CFR §60.48c]

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] (please use blue ink) _____ Responsible Official or Authorized Representative _____ Date

Name and Title (please print or type) _____ Name _____ Title

Telephone No. _____ Fax No. _____

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[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.

Table 4.1.2 - Revisions **Permit R13-03316D**

	NOX		SO2		VOC		PM		CO	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Scrubber stack	1.06	4.66	2.1	1.41	1.8	4.13	6.9	21.7	0.06	0.24
Scrubber Preheater	0.78	0.03	0.01	0.01	0.09	0.01	0.12	0.01	1.3	0.05
Surfactant Manufacturing Tanks					0.35	1.54				
Truck Loading					0.01	0.06				
Liquid Soap Outdoor Tanks					0.24	1.7				
Liquid Soap Indoor Tanks					0.17	0.76				
Liquid Soap C Tanks					0.13	0.55	0.01	0.01		
Liquid Soap Packing and Capping					0.01	0.01				
Liquid Soap C Packing and Capping					0.40	1.75				
Liquid Soap C Truck Loading					0.15	0.65				
Rotoclones					33.23	33.42	4.57	20.06		
RTO	0.24	1.1	0.01	0.01	213.5	8	0.02	0.07	1.3	5.8
Dry Product Manufacturing Outdoor Tanks					0.07	0.31				
Dry Product Manufacturing Indoor Tanks					0.62	0.76				
Baghouses/Fabric Filters							3.81	16.71		
Dry Product Manufacturing Fugitives					2	8.7				
Consumer Cleaning Product B-E Tanks					0.14	0.6				
Consumer Cleaning Product B-E Converting							0.34	1.5		
Consumer Cleaning Product B-E Converting Operations Vent					0.11	0.48				
Main Facility Boilers	11.31	49.54	0.1	0.41	0.56	2.46	1.17	5.14	5.78	25.33
Main Facility Cooling Towers							1.35	5.9		
Main Facility Engines	21.08	5.27	0.04	0.01	1.08	0.27	0.48	0.12	6.32	1.58
Process Heaters	0.9	3.9	0.02	0.05	0.1	0.44	0.14	0.6	1.51	6.6
Water Treatment					2.99	13.04				
Ink and Glue Usage					0.21	0.91				
Plastics Molding Cyclones							0.29	0.35		
Plastic Moldings Silos							2.91	3.5		
Plastic Regrind							0.04	0.17		
Plastic Molding Fugitives					2.07	9.07				
Plastic Molding Space Heating	0.83	3.65	0.01	0.04	0.1	0.41	0.13	0.56	1.4	6.13
Plastic Molding Cooling Tower							0.42	1.84		
Plastic Molding Engines	0.01	0.01	0.01	0.01	0.06	0.01	0.02	0.01	0.02	0.01
Cooling Tower - 253E							0.02	0.08		
De Minimis					0.2	1.0				
New Total	**36.21**	**68.16**	**2.30**	**1.95**	**260.42**	**91.04**	**22.74**	**78.33**	**17.69**	**45.74**