

Procter & Gamble

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

June 19, 2017

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 R13-3316 Amendment*

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 manufacturing, plastics molding supplier, and related utilities.

P&G is making the following Class II administrative updates to the application submitted October 11, 2016.

1. Removal of eight tanks originally planned for the Dry Consumer Laundry and Cleaning Products A area;
2. Addition of one flexible perfume delivery system in the Dry Consumer Laundry and Cleaning Products area;
 - a. By eliminating the tanks and adding the smaller flexible perfume delivery system, P&G seeks to provide a more agile perfume operation with improved quality control.
3. A small (2 MM BTU/hr) increase in the size of Boiler 3¹;
4. An increase in the capacity of the site fire protection diesel fire pump engines,
5. An additional 80 kW diesel engine-powered backup generator².

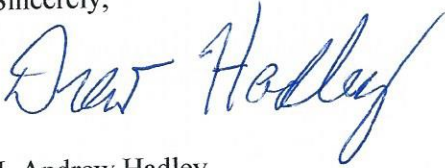
The proposed minor changes result in an overall plant-wide increase in particulates of 0.16 tons per year (tpy), oxides of nitrogen 0.39 tpy, carbon monoxide 0.46 tpy, volatile organic compounds 0.24 tpy, and hazardous air pollutants 0.02 tpy. These changes do not affect the facility's classification as a minor source for Prevention of Significant Deterioration and Title V.

¹ Boiler 3 is subject to New Source Performance Standard Subpart Dc.

² The generator is subject to the recordkeeping and monitoring requirements of New Source Performance Standard Subpart III. Emissions standards may be found in Table 1 in 40 CFR 89.112.

We appreciate your continued support to 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,

A handwritten signature in blue ink that reads "J. Andrew Hadley". The signature is written in a cursive style with a large initial "J" and "H".

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

Enclosure

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



WEST 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): The 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: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: The Procter & Gamble Manufacturing Company Sharon Woods Innovation Center A2M11-3 11510 Reed Hartman Highway Cincinnati, OH 45241		5B. Facility's present physical address: Procter & Gamble – Tabler Station Site 396 Development Drive Inwood, WV 25428	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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 <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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	
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): R13-3316	

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:

12D. County:

Inwood, WV

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:

Fire Pump engine size change, New diesel generator, Flexible Perfume Delivery System for Dry Consumer Products A.

14A. Provide the date of anticipated installation or change: **7/01/2017**

- 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:

08/01/2017

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:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger	

General Emission Unit, specify - **Flexible Perfume Delivery System**

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

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

<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> 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:

<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> 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 _____
(Please use blue ink)

DATE: 6/12/17
(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:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet |
| <input type="checkbox"/> Attachment B: Map(s) | <input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s) |
| <input type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input type="checkbox"/> Attachment D: Regulatory Discussion | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input type="checkbox"/> Attachment E: Plot Plan | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input checked="" type="checkbox"/> Attachment P: Public Notice |
| <input type="checkbox"/> Attachment G: Process Description | <input type="checkbox"/> Attachment Q: Business Confidential Claims |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table | <input type="checkbox"/> Attachment S: Title V Permit Revision Information |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> 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 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
1S	1E	Surfactant Making Process	2017	3,000 gal/hr	New	1C
2S	2E	Surfactant Making Process	2017	3,000 gal/hr	New	2C
3S	3E	Surfactant Tanks	2017	120,762 gal	New	--
4S	4E	Surfactant Tanks	2017	48,345 gal	New	--
5S	5E	Surfactant Tanks	2017	40,109 gal	New	--
6S	6E	Surfactant Tanks	2017	40,109 gal	New	--
7S	7E	Surfactant Tanks	2017	15,125 gal	New	--
8S	8E	Surfactant Tanks	2017	15,125 gal	New	--
9S	9E	Surfactant Tanks	2017	15,125 gal	New	--
10S	10E	Surfactant Tanks	2017	72,475 gal	New	--
11S	11E	Surfactant Tanks	2017	72,475 gal	New	--
12S	12E	Surfactant Tanks	2017	72,475 gal	New	--
13S	13E	Surfactant Tanks	2017	72,475 gal	New	--
14S	14E	Surfactant Tanks	2017	72,475 gal	New	--
15S	15E	Surfactant Tanks	2017	72,475 gal	New	--
16S	16E	Surfactant Tanks	2017	26,083 gal	New	--
17S	17E	Surfactant Tanks	2017	15,125 gal	New	--
18S	18E	Surfactant Tanks	2017	15,125 gal	New	--
19S	19E	Surfactant Bulk Liquid Transfer	2017	17,150,000 gal/yr	New	--
20S	20E	Liquid Soap A and B Tanks	2017	79,252 gal	New	--
21S	21E	Liquid Soap A and B Tanks	2017	79,252 gal	New	--
22S	22E	Liquid Soap A and B Tanks	2017	79,252 gal	New	--
23S	23E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
24S	24E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
25S	25E	Liquid Soap A and B Tanks	2017	39,626 gal	New	--
26S	26E	Liquid Soap A and B Tanks	2017	15,850 gal	New	--
27S	27E	Liquid Soap A and B Tanks	2017	39,626 gal	New	--
28S	28E	Liquid Soap A and B Tanks	2017	26,417 gal	New	--
29S	29E	Liquid Soap A and B Tanks	2017	15,850 gal	New	--
30S	30E	Liquid Soap A and B Tanks	2017	26,417 gal	New	--
31S	31E	Liquid Soap A and B Tanks	2017	15,850 gal	New	--
32S	32E	Liquid Soap A and B Tanks	2017	15,850 gal	New	--
33S	33E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
34S	34E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
35S	35E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
36S	36E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
37S	37E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
50S	50E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
56S	56E	Liquid Soap A and B Tanks	2017	7,275 gal	New	--
53S	53E	Liquid Soap A and B Tanks	2017	7,925 gal	New	--
38S	38E	Liquid Soap A and B Tanks	2017	396 gal	New	--
40S	40E	Liquid Soap A and B Tanks	2017	396 gal	New	--
41S	41E	Liquid Soap A and B Tanks	2017	396 gal	New	--
42S	42E	Liquid Soap A and B Tanks	2017	396 gal	New	--
43S	43E	Liquid Soap A and B Tanks	2017	396 gal	New	--
44S	44E	Liquid Soap A and B Tanks	2017	396 gal	New	--
45S	45E	Liquid Soap A and B Tanks	2017	396 gal	New	--
46S	46E	Liquid Soap A and B Tanks	2017	396 gal	New	--
47S	47E	Liquid Soap A and B Tanks	2017	396 gal	New	--
51S	51E	Liquid Soap A and B Tanks	2017	396 gal	New	--
52S	52E	Liquid Soap A and B Tanks	2017	396 gal	New	--
54S	54E	Liquid Soap A and B Tanks	2017	660 gal	New	--
55S	55E	Liquid Soap A and B Tanks	2017	396 gal	New	--
57S	57E	Liquid Soap A and B Tanks	2017	1,057 gal	New	--
59S	59E	Liquid Soap A and B Tanks	2017	396 gal	New	--
60S	60E	Liquid Soap A and B Tanks	2017	132 gal	New	--
61S	61E	Liquid Soap A and B Tanks	2017	396 gal	New	--
63S	63E	Liquid Soap A and B Tanks	2017	396 gal	New	--
64S	64E	Liquid Soap A and B Tanks	2017	396 gal	New	--
65S	65E	Liquid Soap A and B Tanks	2017	396 gal	New	--
66S	66E	Liquid Soap A and B Tanks	2017	396 gal	New	--
67S	67E	Liquid Soap A and B Tanks	2017	396 gal	New	--
68S	68E	Liquid Soap A and B Tanks	2017	396 gal	New	--
69S	69E	Liquid Soap A and B Tanks	2017	396 gal	New	--
70S	70E	Liquid Soap A and B Tanks	2017	396 gal	New	--
71S	71E	Liquid Soap A and B Tanks	2017	396 gal	New	--
72S	72E	Liquid Soap A and B Tanks	2017	396 gal	New	--
73S	73E	Liquid Soap A and B Tanks	2017	396 gal	New	--
74S	74E	Liquid Soap A and B Tanks	2017	396 gal	New	--
75S	75E	Liquid Soap A and B Tanks	2017	396 gal	New	--
76S	76E	Liquid Soap A and B Tanks	2017	396 gal	New	--
77S	77E	Liquid Soap A and B Tanks	2017	396 gal	New	--
87S	87E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
88S	88E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
89S	89E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
90S	90E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
91S	91E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
92S	92E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
93S	93E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
94S	94E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
94bS	94bE	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
94cS	94cE	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
94dS	94dE	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
94eS	94eE	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
95S	95E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
96S	96E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
97S	97E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
98S	98E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
99S	99E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
100S	100E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
101S	101E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
102S	102E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
103S	103E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
104S	104E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
105S	105E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
106S	106E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
107S	107E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
108S	108E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
109S	109E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
110S	110E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
111S	111E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
112S	112E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
113S	113E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
114S	114E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
115S	115E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
116S	116E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
117S	117E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
118S	118E	Liquid Soap A and B Tanks	2017	1,585 gal	New	--
119S	119E	Liquid Soap A and B Packing/Filling	2017	139,798,617 gal/yr	New	--
120S		Mixer 1 for Premix Process 1	2017		New	
121S	120E	Mixer 2 for Premix Process 1	2017	1,182,600,000 scf/yr	New	3C
122S		Premix Tank 1 for Premix Process 1	2017		New	
123S		Premix Tank 2 for Premix Process 1	2017		New	
124S		Mixer 1 for Liquid Soap B Process 1	2017		New	
125S	121E	Process Tank 1 for Liquid Soap B Process 1	2017	2,496,600,000 scf/yr	New	4C
126S		Process Tank 2 for Liquid Soap B Process 1	2017		New	
127S		Process Tank 3 for Liquid Soap B Process 1	2017		New	
128S		Mixer 1 for Liquid Soap B Process 2	2017		New	
129S	122E	Process Tank 1 for Liquid Soap B Process 2	2017	2,496,600,000 scf/yr	New	5C
130S		Process Tank 2 for Liquid Soap B Process 2	2017		New	
131S		Process Tank 3 for Liquid Soap B Process 2	2017		New	
132S		Mixer 1 for Liquid Soap B Process 3	2017		New	
133S	123E	Process Tank 1 for Liquid Soap B Process 3	2017	1,655,640,000 scf/yr	New	6C
134S		Process Tank 2 for Liquid Soap B Process 3	2017		New	
135S		Process Tank 3 for Liquid Soap B Process 3	2017		New	
136S		Preweigh Station 1	2017		New	
137S	124E	Preweigh Station 2	2017	525,600,000 scf/yr	New	7C
138S		Preweigh Station 3	2017		New	
139S		Preweigh Station 4	2017		New	
140S		Preweigh Station 5	2017		New	
141S	125E	Preweigh Station 6	2017	525,600,000 scf/yr	New	8C
142S		Preweigh Station 7	2017		New	
143S		Preweigh Station 8	2017		New	
144S		Sampling Station	2017		New	

**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
145S	126E	Hot Mix Tank for Liquid Soap A Process 1	2017	20,611,765 cf/year	New	14C
146S		Mixer 1 for Liquid Soap A Process 1	2017		New	
147S	127E	Process Tank 1 for Liquid Soap A Process 1	2017	919,800,000 scf/yr	New	9C
148S		Process Tank 2 for Liquid Soap A Process 1	2017		New	
149S	126E	Hot Mix Tank for Liquid Soap A Process 2	2017	20,611,765 cf/year	New	14C
150S		Mixer 1 for Liquid Soap A Process 2	2017		New	
151S	128E	Process Tank 1 for Liquid Soap A Process 2	2017	919,800,000 scf/yr	New	10C
152S		Process Tank 2 for Liquid Soap A Process 2	2017		New	
153S	126E	Hot Mix Tank for Liquid Soap A Process 3	2017	20,611,765 cf/year	New	14C
154S		Mixer 1 for Liquid Soap A Process 3	2017		New	
155S	129E	Process Tank 1 for Liquid Soap A Process 3	2017	919,800,000 scf/yr	New	11C
156S		Process Tank 2 for Liquid Soap A Process 3	2017		New	
157S	126E	Hot Mix Tank for Liquid Soap A Process 4	2017	20,611,765 cf/year	New	14C
158S		Mixer 1 for Liquid Soap A Process 4	2017		New	
159S	130E	Process Tank 1 for Liquid Soap A Process 4	2017	1,603,080,000 scf/yr	New	12C
160S		Process Tank 2 for Liquid Soap A Process 4	2017		New	
161S	131E	Process Tank 1 for Liquid Soap B Process 4	2017	735,840,000 scf/yr	New	13C
162S		Process Tank 2 for Liquid Soap B Process 4	2017		New	
163S	132E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	42,879 gal	New	--
164S	133E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	37,641 gal	New	--
165S	134E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	6,809 gal	New	--
166S	135E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	396 gal	New	--
167S	136E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	396 gal	New	--
168S	137E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	396 gal	New	--
169S	138E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
170S	139E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
171S	140E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
172S	141E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
173S	142E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
174S	143E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
175S	144E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
176S	145E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
177S	146E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
178S	147E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
179S	148E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
180S	149E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
181S	150E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
182S	151E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
183S	152E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
184S	153E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
185S	154E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
186S	155E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
187S	156E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
188S	157E	Dry Consumer Laundry and Cleaning Products A Tanks	2017	181 gal	New	--
189S	158E	Dry Consumer Laundry and Cleaning Products A Particulate Control 1	2017	17,450 scfm	New	15C
190S	159E	Dry Consumer Laundry and Cleaning Products A Particulate Control 2	2017	17,450 scfm	New	16C
191S	160E	Dry Consumer Laundry and Cleaning Products A Particulate Control 3	2017	17,450 scfm	New	17C
192S	161E	Dry Consumer Laundry and Cleaning Products A Particulate Control 4	2017	17,450 scfm	New	18C
193S	162E	Dry Consumer Laundry and Cleaning Products A Particulate Control 5	2017	17,450 scfm	New	19C
194S	163E	Dry Consumer Laundry and Cleaning Products A Particulate Control 6	2017	8,000 scfm	New	20C
195S	164E	Dry Consumer Laundry and Cleaning Products A Additive 1	2017	109 ft/s	New	--
196S	165E	Boiler 1	2017	62 MMBtu/hr	New	--
197S	166E	Boiler 2	2017	62 MMBtu/hr	New	--
198S	167E	Boiler 3	2017	31 MMBtu/hr 33 MMBtu/hr	New	--
199S	168E	Temporary Boiler	2017	11 MMBtu/hr	New	--
200S	169E	Cooling Tower	2017	331 Mgal/hr	New	--
201S	170E	Cooling Tower	2017	792 Mgal/hr	New	--
202S	171E	Cooling Tower	2017	212 Mgal/hr	New	--
203S	172E	Fire Pump Engine	2017	311 hp 399 hp	New	--
204S	173E	Fire Pump Engine	2017	311 hp 399 hp	New	--
205S	174E	Backup/Standby Power Generator	2017	350 kW	New	--
206S	175E	Backup/Standby Power Generator	2017	350 kW	New	--
207S	176E	Backup/Standby Power Generator	2017	350 kW	New	--
208S	177E	Fuel Tanks	2017	5,000 gal	New	--
210S	179E	Warehouse Heater	2017	3.05 MMBtu/hr	New	--
211S	180E	Warehouse Heater	2017	3.05 MMBtu/hr	New	--
212S	181E	Warehouse Heater	2017	3.05 MMBtu/hr	New	--
213S	182E	Warehouse Heater	2017	3.05 MMBtu/hr	New	--
214S	183E	Warehouse Heater	2017	3.05 MMBtu/hr	New	--
215S	184E	Warehouse Heater	2017	3.05 MMBtu/hr	New	--
216S	185E	Water Pretreatment Chemicals	2017	174,928 kg/yr	New	--
217S	186E	Railcar Unloading 1	2017		New	21C
218S	187E	Railcar Unloading 2	2017		New	22C
219S	188E	Railcar Unloading 3	2017	100,000 tons/year	New	23C
220S	189E	Railcar Unloading 4	2017		New	24C
221S	190E	Railcar Unloading 5	2017		New	25C
222S	191E	Storage Silo 1	2017		New	--
223S	192E	Storage Silo 2	2017		New	--
224S	193E	Storage Silo 3	2017		New	--
225S	194E	Storage Silo 4	2017		New	--
226S	195E	Storage Silo 5	2017		New	--
227S	196E	Storage Silo 6	2017		New	--
228S	197E	Storage Silo 7	2017		New	--
229S	198E	Storage Silo 8	2017		New	--
230S	199E	Storage Silo 9	2017		New	--
231S	200E	Storage Silo 10	2017		New	--
232S	201E	Storage Silo 11	2017		New	--
233S	202E	Storage Silo 12	2017		New	--
234S	203E	Storage Silo 13	2017	100,000 tons/year	New	--
235S	204E	Storage Silo 14	2017		New	--
236S	205E	Storage Silo 15	2017		New	--
237S	206E	Storage Silo 16	2017		New	--
238S	207E	Storage Silo 17	2017		New	--
239S	208E	Storage Silo 18	2017		New	--
240S	209E	Storage Silo 19	2017		New	--
241S	210E	Storage Silo 20	2017		New	--
242S	211E	Storage Silo 21	2017		New	--
243S	212E	Storage Silo 22	2017		New	--
244S	213E	Storage Silo 23	2017		New	--
245S	214E	Storage Silo 24	2017		New	--
246S	215E	Plastic Regrind	2017	32,000 tons/year	New	26C
247S	216E	Forming VOC	2017	100,000 tons/year	New	--
248S	217E	Parts Washing/Process Cleaning	2017	6 tons/year	New	--
249S	218E	Space Heater 1	2017	5 MMBtu/hr	New	--
250S	219E	Space Heater 2	2017	5 MMBtu/hr	New	--
251S	220E	Space Heater 3	2017	2.5 MMBtu/hr	New	--
252S	221E	Space Heater 4	2017	2.5 MMBtu/hr	New	--
253S	222E	Space Heater 5	2017	1 MMBtu/hr	New	--
254S	223E	Space Heater 6	2017	1 MMBtu/hr	New	--
255S	224E	Cooling Tower	2017	7,000 gpm	New	--
256S	225E	Backup Generator	2017	0.2 MMBtu/hr	New	--
257S	226E	Printing Ink	2017	3,430 lb/year	New	--
258S	227E	Case Packing Glue	2017	690,080 lb/year	New	--
259S	228E	Liquid Soap A and B Tanks	2017	79,252 gal	New	--
260S	229E	Liquid Soap A and B Tanks	2017	79,252 gal	New	--
261S	230E	Liquid Soap A and B Tanks	2017	79,252 gal	New	--
262S	232E	Dry Consumer Laundry and Cleaning Products A Flexible Perfume Delivery	2017	30 gal	New	--
263S	233E	Backup/Standby Power Generator	2017	83 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 I
Sources of Minor Significance Emission Units Table (<0.5 tpy)

Emission Unit ID ¹	Emission Point ID ²	Emission Unit Description
3S-5S	3E-5E	Surfactant Tanks
7S-18S	7E-18E	Surfactant Tanks
19S	19E	Surfactant Bulk Liquid Transfer
20S-31S	20E-31E	Liquid Soap A and B Tanks
33S-37S	33E-37E	Liquid Soap A and B Tanks
38S-118S	38E-118E	Liquid Soap A and B Tanks
259S-261S	228E-230E	Liquid Soap A and B Tanks ¹
119S	119E	Liquid Soap A and B Packing/Filling
161S	131E	Process Tank 1 for Liquid Soap B Process 4
162S	131E	Process Tank 2 for Liquid Soap B Process 4
163S-S	163E-E	Dry Consumer Laundry and Cleaning Products A Tanks
189S	189E	Dry Consumer Laundry and Cleaning Products A Particulate Control 1
190S	190E	Dry Consumer Laundry and Cleaning Products A Particulate Control 2
191S	191E	Dry Consumer Laundry and Cleaning Products A Particulate Control 3
208S	177E	Fuel Tanks
n/a	n/a	Haul Roads
n/a	n/a	Steam Venting System for Sanitization of Equipment for Liquid Soap A and B
n/a	n/a	PM emissions from forming operations - occur inside building, no access to open air (45 CSR 7)
n/a	n/a	PM emissions from transportation operations - occur inside building, no access to open air (45 CSR 7)
n/a	n/a	Printing Ink
n/a	n/a	Case Packing Glue
n/a	n/a	Additional de minimis sources from 45 CSR 13, Table 45-13b

1) Liquid soap tanks are considered de minimis sources, per 45 CSR 13, Table 45-13b, #49.

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 ³)
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
1E	Upward Vertical Stack	1C	Surfactant Making Process	N/A	N/A	N/A	N/A	NO _x			9.24E-01	2.3	Gas	O - Vendor and AP-42	
								CO			6.86E-01	1.4E-01			
								SO ₂			1.0	7.0E-01			
								VOC			0.9	2.1			
								PM			3.5	11.9			
								PM ₁₀ /PM _{2.5}			3.5	11.9			
								H ₂ SO ₄			2.5	9.8			
2E	Upward Vertical Stack	2C	Surfactant Making Process	N/A	N/A	N/A	N/A	NO _x			0.9	2.3	Gas	O - Vendor and AP-42	
								CO			6.9E-01	0.1			
								SO ₂			1.0	0.7			
								VOC			0.9	2.1			
								PM			3.5	9.8			
								PM ₁₀ /PM _{2.5}			3.5	9.8			
								H ₂ SO ₄			2.5	7.8			
3E-18E	Upward Vertical Stack	N/A	Surfactant Tanks	N/A	N/A	N/A	N/A	VOC	2.8E-01	1.2	2.8E-01	1.2	Gas	O - EPA Tanks	
								H ₂ SO ₄	3.5E-04	1.5E-03	3.5E-04	1.5E-03	Gas	O - EPA Tanks	
								HAP	2.1E-02	9.1E-02	2.1E-02	9.1E-02	Gas	EE	
19E	Upward Vertical Stack	N/A	Surfactant Bulk Liquid Transfer	N/A	N/A	N/A	N/A	VOC	1.2E-02	5.2E-02	1.2E-02	5.2E-02	Gas	O - AP-42	
								H ₂ SO ₄	5.5E-04	2.4E-03	5.5E-04	2.4E-03	Gas	O - AP-42	
								PM ₁₀ /PM _{2.5}	5.5E-04	2.4E-03	5.5E-04	2.4E-03	Gas	O - AP-42	
								HAP	1.5E-02	5.33E-04	1.5E-02	5.33E-04	Gas	O - EPA Tanks	
20E-118E and 228E - 230E	Upward Vertical Stack	N/A	Liquid Soap A and B Tanks	N/A	N/A	N/A	N/A	VOC	4.13E-01	2.5	4.13E-01	2.5	Gas	O - EPA Tanks	
								HAP	2.1E-02	9.1E-02	2.1E-02	9.1E-02	Gas	O - AP-42	
119E	Upward Vertical Stack	N/A	Liquid Soap A and B Packing/Filling	N/A	N/A	N/A	N/A	VOC	2.5E-04	1.1E-03	2.5E-04	1.1E-03	Gas	O - AP-42	
120E	Upward Vertical Stack	3C	Premix Process 1	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			3.9E-01	1.69	Gas	EE	
								VOC			2.0E-01	8.59E-01	Gas	EE	
121E	Upward Vertical Stack	4C	Liquid Soap B Process 1	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			8.1E-01	3.6	Gas	EE	
								VOC			3.64E-01	1.6	Gas	EE	
122E	Upward Vertical Stack	5C	Liquid Soap B Process 2	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			8.1E-01	3.6	Gas	EE	
								VOC			4.40E-01	1.9	Gas	EE	
123E	Upward Vertical Stack	6C	Liquid Soap B Process 3	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			5.4E-01	2.4	Gas	EE	
								VOC			3.64E-01	1.6	Gas	EE	
124E	Upward Vertical Stack	7C	Preweigh Group 1	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			1.7E-01	7.51E-01	Gas	EE	
								VOC			--	--	Gas	EE	
125E	Upward Vertical Stack	8C	Preweigh Group 2	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			1.7E-01	7.51E-01	Gas	EE	
								VOC			--	--	Gas	EE	
127E - 130E	Upward Vertical Stack	9C - 12C	Liquid Soap A Process 1-4	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			1.42	6.2	Gas	EE	
								VOC			31.9	27.4	Gas	MB	

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			
131E	Upward Vertical Stack	13C	Liquid Soap B Process 4	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			2.4E-01	1.05	Gas	EE	
								VOC			9.9E-03	4.3E-02	Gas	EE	
126E	Upward Vertical Stack	14C	Hot Mix Tanks for Liquid Soap A, Process 1-4	N/A	N/A	N/A	N/A	PM ₁₀ /PM _{2.5}			1.5E-02	6.5E-02	Gas	O - AP-42	
								SO ₂			1.4E-03	6.2E-03	Gas	O - AP-42	
								NO _x			2.4E-01	1.1	Gas	O - Vendor	
								VOC			1.24	5.4	Gas	MB	
								CO			1.33	5.8	Gas	O - Vendor	
Lead			1.2E-06	5.2E-06	Gas	O - AP-42									
132E-149E and 232E	Upward Vertical Stack	N/A	Dry Consumer Laundry and Cleaning Products A Tanks	N/A	N/A	N/A	N/A	VOC	6.87E-01	1.06E+00	6.9E-01	1.1E+00	Gas	EE	
158E	Upward Vertical Stack	15C	Dry Consumer Laundry and Cleaning Products A Particulate Control 1	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			6.9E-02	3.0E-01	Gas	EE	
159E	Upward Vertical Stack	16C	Dry Consumer Laundry and Cleaning Products A Particulate Control 2	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			4.7E-02	2.1E-01	Gas	EE	
160E	Upward Vertical Stack	17C	Dry Consumer Laundry and Cleaning Products A Particulate Control 3	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.6}			4.5E-02	2.0E-01	Gas	EE	
161E	Upward Vertical Stack	18C	Dry Consumer Laundry and Cleaning Products A Particulate Control 4	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.7}			1.54E+00	6.8	Gas	EE	
162E	Upward Vertical Stack	19C	Dry Consumer Laundry and Cleaning Products A Particulate Control 5	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			1.54E+00	6.8	Gas	EE	
163E	Upward Vertical Stack	20C	Dry Consumer Laundry and Cleaning Products A Particulate Control 6	N/A	N/A	N/A	N/A	PM/PM ₁₀ /PM _{2.5}			5.57E-01	2.4	Gas	EE	
164E	Upward Vertical Stack	N/A	Dry Consumer Laundry and Cleaning Products A Additive 1	N/A	N/A	N/A	N/A	VOC	3.6E-01	1.6	2.0	8.7	Gas	EE	
165E	Upward Vertical Stack	N/A	Boiler 1	N/A	N/A	N/A	N/A	NO _x	4.5	19.8	4.5	19.8	Gas	O - AP-42	
								CO	2.3	10.0	2.3	10.0			
								SO ₂	3.7E-02	0.2	3.7E-02	1.6E-01			
								VOC	2.2E-01	1.0	2.2E-01	9.8E-01			
								PM	2.4E-01	1.0	2.4E-01	1.03			
								PM ₁₀	4.7E-01	2.0	4.7E-01	2.04			
								PM _{2.5}	4.7E-01	2.0	4.7E-01	2.04			

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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 ³)
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
166E	Upward Vertical Stack	N/A	Boiler 2	N/A	N/A	N/A	N/A	H ₂ SO ₄	4.0E-04	0.0	4.0E-04	1.8E-03	Gas	O - AP-42	
								HAP	1.1E-01	0.5	1.1E-01	5.0E-01			
								NO _x	4.5	19.8	4.5	19.8			
								CO	2.3	10.0	2.3	10.0			
								SO ₂	3.7E-02	1.6E-01	3.7E-02	1.6E-01			
								VOC	2.2E-01	1.0	2.2E-01	1.0			
								PM	2.4E-01	1.0	2.4E-01	1.0			
								PM ₁₀	4.7E-01	2.0	4.7E-01	2.0			
								PM _{2.5}	4.7E-01	2.0	4.7E-01	2.0			
								H ₂ SO ₄	4.0E-04	1.8E-03	4.0E-04	1.8E-03			
HAP	1.1E-01	5.0E-01	1.1E-01	5.0E-01											
167E	Upward Vertical Stack	N/A	Boiler 3	N/A	N/A	N/A	N/A	NO _x	2.3	10.0	2.3	10.0	Gas	O - AP-42	
								CO	1.2	5.3	1.2	5.3			
								SO ₂	1.9E-02	8.4E-02	1.9E-02	8.4E-02			
								VOC	1.2E-01	5.1E-01	1.2E-01	5.1E-01			
								PM	2.4E-01	1.1	2.4E-01	1.1			
								PM ₁₀	2.4E-01	1.1	2.4E-01	1.1			
								PM _{2.5}	2.4E-01	1.1	2.4E-01	1.1			
								H ₂ SO ₄	2.1E-04	9.3E-04	2.1E-04	9.3E-04			
HAP	6.0E-02	2.6E-01	6.0E-02	2.6E-01											
168E	Upward Vertical Stack	N/A	Temporary Boiler	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Gas	N/A	
169E-171E	Upward Vertical Stack	N/A	Cooling Tower	N/A	N/A	N/A	N/A	PM	1.337	5.855	1.337	5.855	Gas	O - AP-42	
								PM ₁₀	6.28E-01	2.750	6.28E-01	2.750			
								PM _{2.5}	5.24E-04	2.30E-03	5.24E-04	2.30E-03			
172E-173E	Upward Vertical Stack	N/A	Fire Pump Engine	N/A	N/A	N/A	N/A	NO _x	4.6	1.1E+00	4.6	1.1E+00	Gas	O - Vendor	
								CO	1.4	3.5E-01	1.4	3.5E-01			
								SO ₂	2.5E-03	6.1E-04	2.5E-03	6.1E-04			
								VOC	1.8E-01	4.4E-02	1.8E-01	4.4E-02			
								PM	1.8E-01	4.4E-02	1.8E-01	4.4E-02			
								PM ₁₀	1.8E-01	4.4E-02	1.8E-01	4.4E-02			
								PM _{2.5}	1.8E-01	4.4E-02	1.8E-01	4.4E-02			
HAP	3.6E-02	8.9E-03	3.6E-02	8.9E-03											
174E-176E and 233E	Upward Vertical Stack	N/A	Backup/Standby Power Generator	N/A	N/A	N/A	N/A	NO _x	11.1	2.8	11.1	2.8	Gas	O - Vendor	
								CO	1.9	4.7E-01	1.9	4.7E-01			
								SO ₂	4.8E-03	1.2E-03	4.78E-03	1.2E-03			
								VOC	1.6E-01	4.0E-02	1.58E-01	4.0E-02			
								PM	1.8E-01	4.4E-02	1.75E-01	4.4E-02			
								PM ₁₀	1.7E-01	4.2E-02	1.69E-01	4.2E-02			
PM _{2.5}	1.7E-01	4.2E-02	1.69E-01	4.2E-02											
HAP	7.0E-02	1.7E-02	7.00E-02	1.7E-02											
177E	Upward Vertical Stack	N/A	Fuel Tanks	N/A	N/A	N/A	N/A	VOC	5.2E-04	2.3E-03	5.2E-04	2.3E-03	Gas	O - EPA Tanks	
179E-184E	Upward Vertical Stack	N/A	Warehouse Heater	N/A	N/A	N/A	N/A	NO _x	9.0E-01	3.93	9.0E-01	3.9	Gas	O - AP-42	
								CO	1.51	6.60	1.51	6.60			
								SO ₂	1.1E-02	4.7E-02	1.1E-02	4.7E-02			
								VOC	9.9E-02	4.3E-01	9.9E-02	4.3E-01			
								PM	1.4E-01	6.0E-01	1.4E-01	6.0E-01			
								PM ₁₀	1.4E-01	6.0E-01	1.4E-01	6.0E-01			
								PM _{2.5}	1.4E-01	6.0E-01	1.4E-01	6.0E-01			
H ₂ SO ₄	1.2E-04	5.1E-04	1.2E-04	5.1E-04											
HAP	3.4E-02	1.5E-01	3.4E-02	1.5E-01											

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			
185E	Fugitive	N/A	Water Pretreatment Chemicals	N/A	N/A	N/A	N/A	VOC	3.0	13.0	3.0	13.0	Gas	EE	
								HAP	9.1E-04	4.0E-03	9.1E-04	4.0E-03			
186E-190E	Upward Vertical Stack	21C-25C	Railcar Unloading	N/A	N/A	N/A	N/A	PM	2.91	3.50	2.91E-01	3.50E-01	Gas	O - Vendor	
								PM ₁₀	2.91	3.50	2.91E-01	3.50E-01			
								PM _{2.5}	2.91	3.50	2.91E-01	3.50E-01			
191E-214E	Upward Vertical Stack	N/A	Storage Silo	N/A	N/A	N/A	N/A	PM	2.91	3.50	2.91	3.5	Gas	O - Vendor	
								PM ₁₀	2.91	3.50	2.91	3.5			
								PM _{2.5}	2.91	3.50	2.91	3.5			
215E	Upward Vertical Stack	N/A	Plastic Re grind	N/A	N/A	N/A	N/A	PM	7.67E-01	3.36	3.84E-02	1.68E-01	Gas	O - Vendor	
								PM ₁₀	7.67E-01	3.36	3.84E-02	1.68E-01			
								PM _{2.5}	7.67E-01	3.36	3.84E-02	1.68E-01			
216E	Upward Vertical Stack	N/A	Forming VOC	N/A	N/A	N/A	N/A	VOC	7.01E-01	3.07	7.01E-01	3.1	Gas	O - Vendor	
217E	Upward Vertical Stack	N/A	Parts Washing/Process Cleaning	N/A	N/A	N/A	N/A	VOC	1.4E+00	6.00	1.4	6.0	Gas	O - Vendor	
218E-223E	Upward Vertical Stack	N/A	Space Heater	N/A	N/A	N/A	N/A	NO _x	8.33E-01	3.7	8.33E-01	3.7	Gas	O - AP-42	
								CO	1.4	6.1	1.4	6.1			
								SO ₂	1.0E-02	4.4E-02	1.00E-02	4.38E-02			
								VOC	9.2E-02	4.0E-01	9.17E-02	4.02E-01			
								PM	1.3E-01	5.5E-01	1.27E-01	5.55E-01			
								PM ₁₀	1.3E-01	5.5E-01	1.27E-01	5.55E-01			
								PM _{2.5}	1.3E-01	5.5E-01	1.27E-01	5.55E-01			
								H ₂ SO ₄	1.1E-04	4.7E-04	1.08E-04	4.75E-04			
224E	Upward Vertical Stack	N/A	Cooling Tower	N/A	N/A	N/A	N/A	PM	4.2E-01	1.8E+00	4.21E-01	1.84E+00	Gas	O-AP-42	
								PM ₁₀	2.0E-01	8.7E-01	1.98E-01	8.65E-01			
								PM _{2.5}	1.6E-04	7.2E-04	1.65E-04	7.22E-04			
225E	Upward Vertical Stack	N/A	Backup Generator	N/A	N/A	N/A	N/A	NO _x	4.17E-01	1.04E-01	4.17E-01	1.04E-01	Gas	O - AP-42	
								CO	8.33E-01	2.08E-01	8.33E-01	2.08E-01			
								SO ₂	1.18E-04	2.94E-05	1.18E-04	2.94E-05			
								VOC	2.01E-01	5.02E-02	2.01E-01	5.02E-02			
								PM	1.90E-03	4.75E-04	1.90E-03	4.75E-04			
								PM ₁₀	3.88E-03	9.71E-04	3.88E-03	9.71E-04			
								PM _{2.5}	3.88E-03	9.71E-04	3.88E-03	9.71E-04			
226E	Fugitive	N/A	Printing Ink	N/A	N/A	N/A	N/A	HAP	6.48E-03	1.62E-03	6.48E-03	1.62E-03	Gas	EE	
								VOC	8.65E-02	3.79E-01	8.7E-02	3.79E-01			
227E	Fugitive	N/A	Case Packing Glue	N/A	N/A	N/A	N/A	HAP	3.65E-02	1.60E-01	3.7E-02	1.60E-01	Gas	EE	
								VOC	4.73E-02	2.07E-01	4.7E-02	2.07E-01			
								HAP	1.58E-03	6.90E-03	1.6E-03	6.90E-03	Gas	EE	

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. (°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
1E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
2E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
3E-18E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
19E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
20E-118E and 228E - 230E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
119E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
120E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
121E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
122E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
123E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
124E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
125E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
127E - 130E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
131E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
126E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
132E-149E and 232E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
158E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
159E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
160E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
161E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
162E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
163E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
164E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
165E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
166E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
167E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
168E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
169E-171E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
172E-173E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
174E-176E and 233E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
177E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
179E-184E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
185E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
186E-190E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
191E-214E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
215E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
216E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
217E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
218E-223E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
224E	TBD	TBD	TBD	TBD	TBD	TBD	4,366	757
225E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
226E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
227E	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

ATTACHMENT L

Emission Unit Data Sheet

Attachment L			
EMISSIONS UNIT DATA SHEET - INDIRECT HEAT EXCHANGER			
Number:	Question:	Response:	Notes:
	Sheet version:	Indirect Heat Exchanger	
0	Control Device ID No.	167E	
1	Manufacturer	Cleaver - Brooks	
2	Model Number: Serial Number:	TBD	
3	Number of Units	1	
4	Use	Plant steam	
7	Date Constructed	December 2016	
9	Maximum design heat input per unit	32.63	MMBtu/hr
10	Peak heat input per unit		
11	Steam produced at maximum design output	27,600	pph
12	Projected Operating Schedule	24/7/365	
13	Type of Firing Equipment to be Used	Natural Gas Burners	Choose from pulverized coal, spreader stoker, oil burners, natural gas burners, or other.
25	Fuel	Natural Gas	
	Quantity of Fuel Used (ft ³ /hr)	32,630	
	Quantity of Fuel Used Annually (MMft ³ /yr)	285.8	
	BTU Content (BTU/ft ³)	1,000	
38	Emissions after control (lb/hr)		
	CO	1.2	
	NO _x	2.3	
	Pb	1.6E-05	
	PM ₁₀	2.4E-01	
	SO ₂	1.9E-02	
	VOC	1.2E-01	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	Question:	Response:	Notes:
	Sheet version:	General	
0	Identification Number	1S and 2S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Surfactant Making Process	
4	Names and maximum amount of proposed process materials produced per hour	6,000 gal/hr	gal/hr of finished product
5	Give chemical reactions, if applicable, that will be involved in the generation of air pollutants	1. Combustion of liquid S to SO ₂ 2. Oxidation of SO ₂ to SO ₃ 2. SO ₃ reacted with organic fatty alcohol	
6	Combustion data	Sulfur will be burned. Natural gas burned during startup	
7	Projected operating schedule	24/7/365	
8	Pollutant	NO _x	
	Emission Rate (lb/hr)	1.8	
	Pollutant	CO	
	Emission Rate (lb/hr)	1.4	
	Pollutant	SO ₂	
	Emission Rate (lb/hr)	2.1	
	Pollutant	VOC	
	Emission Rate (lb/hr)	1.0	
	Pollutant	PM ₁₀	
	Emission Rate (lb/hr)	7.0	
	Pollutant	H ₂ SO ₄	
	Emission Rate (lb/hr)	5.1	
9	Pollutant	Lead	
	Emission Rate (lb/hr)	7.8E-06	
	Pollutant	HAP	
	Emission Rate (lb/hr)	3.0E-02	
9	Recordkeeping	NSPS VVa: Recordkeeping to show that facility is exempt.	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	Question:	Response:	Notes:
	Sheet version:	General	
0	Identification Number	119S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Liquid Soap A and B Packing/Filling	
4	Names and maximum amount of proposed process materials produced per hour	15,959	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)	2.5E-04	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	Question:	Response:	Notes:
	Sheet version:	General	
0	Identification Number	195S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Dry Consumer Laundry and Cleaning Products A Additive 1	
4	Names and maximum amount of proposed process materials produced per hour	393,701	ft/hr 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)	2.0	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	Question:	Response:	Notes:
	Sheet version:	General	
0	Identification Number	216S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Water Pretreatment Chemicals	
4	Names and maximum amount of proposed process materials produced per hour	44	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)	3.0	
	Pollutant	HAP	
	Emission Rate (lb/hr)	9.1E-04	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	Question:	Response:	Notes:
	Sheet version:	General	
0	Identification Number	247S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Forming	
4	Names and maximum amount of proposed process materials produced per hour	100,000	tons/year
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)	7.0E-01	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	Question:	Response:	Notes:
	Sheet version:	General	
0	Identification Number	248S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Parts Washing/Process Cleaning	
4	Names and maximum amount of proposed process materials produced per hour	6	tons/year
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)	1.4	

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	0.39 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)	8.65E-02	
	Pollutant	HAP	
	Emission Rate (lb/hr)	3.7E-02	

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	79 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)	4.73E-02	
	Pollutant	HAP	
	Emission Rate (lb/hr)	1.6E-03	

Attachment L			
EMISSIONS UNIT DATA SHEET - GENERAL			
Number:	Question:	Response:	Notes:
	Sheet version:	General	
0	Identification Number	262S	as assigned on Equipment List Form
1	Name or type and model of proposed affected source	Dry Consumer Laundry and Cleaning Products A Flexible Perfume Delivery	
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)	5.62E-01	
	Pollutant	HAP	
	Emission Rate (lb/hr)	2.8E-03	

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 ₂ SO ₄
Chemicals	21.7	21.7	21.7	5.4	9.2E-02	4.7	2.9E-01	1.4	17.6
Tanks	--	--	--	1.2	9.1E-02	--	--	--	1.5E-03
Loading	--	--	2.41E-03	5.2E-02	--	--	--	--	2.4E-03
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	20.0	20.0	20.0	33.4	--	--	--	--	--
Packing/Filling	--	--	--	1.11E-03	--	--	--	--	--
Dry Consumer 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	--	--	--	--	--
Utilities	9.7	8.6	5.8	16.0	1.4	57.4	32.8	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	8.8E-02	8.6E-02	8.6E-02	8.4E-02	2.6E-02	3.92	0.83	1.8E-03	--
Cooling Towers	5.9	2.8	2.30E-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	1.1E+01	6.3E+00	4.8E+00	10.11	2.99E-01	3.8E+00	6.3E+00	4.4E-02	4.7E-04
Glue Usage	--	--	--	2.07E-01	6.90E-03	--	--	--	--
Printing	--	--	--	3.79E-01	1.60E-01	--	--	--	--
Paved Roads	4.25	0.85	0.21	--	--	--	--	--	--
Plastics Molding	6.42	5.44	4.57	9.52	1.3E-01	3.75	6.34	4.4E-02	4.7E-04
Total	78.7	73.3	69.0	85.1	1.9	66.88	45.2	1.9	17.6

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	Other Combustion HAP ¹
Total (tpy)	1.48	4.7E-02	6.1E-02	6.9E-03	5.3E-02	1.8E-02	8.2E-05	1.1E-02	4.0E-03	4.2E-04	1.7E-01	2.2E-02

1. Includes: 2-methylnaphthalene, 3-methylchloranthrene, 7,12-Dimethylbenz(a)anthracene, acetaldehyde, acenaphthene, acenaphthylene, acrolein, anthracene, benz(a)anthracene, benzene, 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, phenanthrene, 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-12. Dry Consumer Product A - Indoor Tank Emissions

EU ID	Throughput ¹ (gal/yr)	Vapor Pressure (psia)	Molecular Weight (lb/lb-mol)	Bulk Liquid Temperature (°F)	Liquid Density (lb/gal)	Tank Capacity ¹ (gal)	VOC Potential to Emit ^{2,4}		HAP Potential to Emit ^{3,4}	
							(lb/hr)	(tpy)	(lb/hr)	(tpy)
166	78,893	0.50	200	77	8.81	396	5.4E-03	2.4E-02	2.7E-05	1.2E-04
167	78,893	0.50	200	77	8.81	396	5.4E-03	2.4E-02	2.7E-05	1.2E-04
168	78,893	0.50	200	77	8.81	396	5.4E-03	2.4E-02	2.7E-05	1.2E-04
169	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
170	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
171	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
172	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
173	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
174	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
175	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
176	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
177	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
178	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
179	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
180	39,447	0.50	200	77	8.81	181	3.3E-03	1.4E-02	1.6E-05	7.2E-05
262	n/a	n/a	n/a	n/a	n/a	30	5.6E-01	5.1E-01	2.8E-03	2.6E-03
Total							0.62	0.76	3.09E-03	3.78E-03

1. Tank capacities and throughputs per Procter and Gamble design data sheets. Throughputs are time averaged throughputs based on planned production lines for other similar Procter and Gamble facilities and business units, scaled according to ratio of planned production lines for the facility.

2. 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.

3. HAP emissions from perfumes assumed to be 0.5% of VOC emissions. Based on knowledge of raw materials, HAPs are 99% glycol ether and 1% acetophenone.

4. Emissions from flexible perfume delivery system (EU ID 262) determined based on system changeover time, frequency, and venting duration. System maximizes perfume recovery via pigging, followed by limited venting through carbon adsorption filter.

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	3	350	kW
Backup/Standby Power Generator	1	83	kW
Engine ULSD Tanks	5	< 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 ₂ O heat of vaporization (non-condensate return):	1,178	Btu/lb
H ₂ O heat of vaporization (condensate return):	1,016	Btu/lb
Condensate return:	80%	

Table N-18. Utilities - Boiler Nos. 3 - Parameters

Parameter	Value	Unit
New Boiler Heat Input:	32.63	MMBtu/hr
Number of New Boilers:	1	
Annual Gas Usage:	285.8	MMscf/yr
Equivalent Gas Hours:	8,760	Hours at 100% Load
Natural Gas Heating Value (HHV):	1,000	Btu/scf

Pollutant	Natural Gas Emission Factor	Units	Reference	Natural Gas Hourly Emissions (lb/hr)	Natural Gas Annual Emissions (tpy)	Emissions for Boiler 3 (tpy)
NO _x	60	ppm	2	2.3	10.0	10.0
CO	50	ppm	2	1.2	5.3	5.3
PM	7.50E-03	lb/MMBtu	2	2.43E-01	1.1	1.1
PM ₁₀	7.50E-03	lb/MMBtu	2	2.43E-01	1.1	1.1
PM _{2.5}	7.50E-03	lb/MMBtu	2	2.43E-01	1.1	1.1
SO ₂	6.00E-04	lb/MMBtu	2	1.9E-02	8.4E-02	8.4E-02
VOC	3.60E-03	lb/MMBtu	2	1.2E-01	5.1E-01	5.1E-01
H ₂ SO ₄	6.50E-03	lb/MMscf	3	2.1E-04	9.3E-04	9.3E-04

1. Natural gas emission factors based on manufacturer's ppm specifications for units with LNB and converted to lb/MMBtu using an F factor of 8,710 dscf/MMBtu for natural gas.

2. Guarantees from boiler vendor.

3. Natural gas factor calculated assuming 1% of sulfur becomes H₂SO₄.

Table N-19. Utilities - Boiler Nos. 3 - Parameters

Parameter	Value	Unit
New Boiler Heat Input:	33	MMBtu/hr
Number of New Boilers:	1	
Hours of Operation on Natural Gas:	8,760	hr/yr
Natural Gas Heating Value (HHV):	1,020	Btu/scf

Pollutant	Natural Gas Emission Factor ¹	Units	Emissions	
			lb/hr	tpy
2-Methylnaphthalene	2.4E-05	lb/MMscf	7.7E-07	3.4E-06
3-Methylchloranthrene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
7,12-Dimethylbenz(a)anthracene	1.6E-05	lb/MMscf	5.1E-07	2.2E-06
Acenaphthene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
Acenaphthylene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
Anthracene	2.4E-06	lb/MMscf	7.7E-08	3.4E-07
Benz(a)anthracene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
Benzene	2.1E-03	lb/MMscf	6.7E-05	2.9E-04
Benzo(a)pyrene	1.2E-06	lb/MMscf	3.8E-08	1.7E-07
Benzo(b)fluoranthene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
Benzo(g,h,i)perylene	1.2E-06	lb/MMscf	3.8E-08	1.7E-07
Benzo(k)fluoranthene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
Chrysene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
Dibenzo(a,h)anthracene	1.2E-06	lb/MMscf	3.8E-08	1.7E-07
Dichlorobenzene	1.2E-03	lb/MMscf	3.8E-05	1.7E-04
Fluoranthene	3.0E-06	lb/MMscf	9.6E-08	4.2E-07
Fluorene	2.8E-06	lb/MMscf	9.0E-08	3.9E-07
Formaldehyde	7.5E-02	lb/MMscf	2.4E-03	1.1E-02
Hexane	1.8E+00	lb/MMscf	5.8E-02	2.5E-01
Indeno(1,2,3-cd)pyrene	1.8E-06	lb/MMscf	5.8E-08	2.5E-07
Naphthalene	6.1E-04	lb/MMscf	2.0E-05	8.5E-05
Phenanathrene	1.7E-05	lb/MMscf	5.4E-07	2.4E-06
Pyrene	5.0E-06	lb/MMscf	1.6E-07	7.0E-07
Toulene	3.4E-03	lb/MMscf	1.1E-04	4.8E-04
Arsenic	2.0E-04	lb/MMscf	6.4E-06	2.8E-05
Beryllium	1.2E-05	lb/MMscf	3.8E-07	1.7E-06
Cadmium	1.1E-03	lb/MMscf	3.5E-05	1.5E-04
Chromium	1.4E-03	lb/MMscf	4.5E-05	2.0E-04
Cobalt	8.4E-05	lb/MMscf	2.7E-06	1.2E-05
Lead	5.0E-04	lb/MMscf	1.6E-05	7.0E-05
Manganese	3.8E-04	lb/MMscf	1.2E-05	5.3E-05
Mercury	2.6E-04	lb/MMscf	8.3E-06	3.6E-05
Nickel	2.1E-03	lb/MMscf	6.7E-05	2.9E-04
Selenium	2.40E-05	lb/MMscf	7.7E-07	3.4E-06
Total HAP			6.0E-02	2.6E-01

1. Natural gas emission factors from AP-42, Tables 1.4-3 and 1.4-4

Table N-21. Utilities - Engines - Inventory Summary

Engine Model	Type	Number	Size	Unit
Caterpillar C15	Backup/Standby Power Generator	3	350	kW
John Deere 4045HF285H	Backup/Standby Power Generator	1	83	kW
Clarke JW6H-UFADF0	Fire Pump	2	399	hp

Pollutant	Potential Emissions per Engine, Caterpillar C15 (tpy)	Potential Emissions per Engine, Clarke (tpy)	Potential Emissions per Engine, John Deere (tpy)	Total Emissions (tpy)
CO	1.4E-01	1.8E-01	5.9E-02	8.27E-01
NO _x	8.7E-01	5.7E-01	1.6E-01	3.92E+00
VOC	1.1E-02	2.2E-02	6.9E-03	8.36E-02
SO ₂	3.6E-04	3.1E-04	1.0E-04	1.81E-03
PM	1.2E-02	2.2E-02	7.8E-03	8.78E-02
PM ₁₀	1.2E-02	2.2E-02	7.8E-03	8.63E-02
PM _{2.5}	1.2E-02	2.2E-02	7.8E-03	8.63E-02

Pollutant	Potential Emissions per Engine, Caterpillar C15 (tpy)	Potential Emissions per Engine, Clarke (tpy)	Potential Emissions per Engine, John Deere (tpy)	Total Emissions (tpy)
Benzene	7.7E-04	6.5E-04	2.2E-04	3.8E-03
Toluene	3.4E-04	2.8E-04	9.8E-05	1.7E-03
Xylenes	2.4E-04	2.0E-04	6.8E-05	1.2E-03
Propylene	2.1E-03	1.8E-03	6.2E-04	1.1E-02
Formaldehyde	9.8E-04	8.2E-04	2.8E-04	4.9E-03
Acetaldehyde	6.4E-04	5.3E-04	1.8E-04	3.2E-03
Acrolein	7.7E-05	6.4E-05	2.2E-05	3.8E-04
Polycyclic Aromatic Hydrocarbons (PAH)	1.4E-04	1.2E-04	4.0E-05	6.9E-04
Max HAP	2.1E-03	1.8E-03	6.2E-04	1.1E-02
Total HAPs	5.3E-03	4.5E-03	1.5E-03	2.6E-02

Table N-22b. Utilities - Engines - John Deere 83 kW

Source Designation	Engine	Generator
Date Manufactured	TBD	TBD
Manufacturer ¹	John Deere	Kohler
Model No. ¹	4045HF285H	80REOZJF
Stroke Cycle ¹	4-Stroke	--
Fuel Used ¹	Diesel	--
Fuel Sulfur Content (%) ²	0.0015	--
Rated Capacity (eKW) ¹	83.00	--
Horsepower (bhp) ¹	133	--
Generating Capacity (kW) ¹	--	83.00
Maximum Fuel Consumption at 100% Load (gal/hr) ¹	6.90	--
Heat Input (MMBtu/hr) ³	0.96	--

Operational Detail	Value
Potential Annual Hours of Operation (hr/yr):	500.00
Potential Fuel Consumption (Mgal/yr):	3.45

Pollutant	Emission Factors	Units	Notes
CO	1.30E+00	g/kW-hr	1
NO _x	3.40	g/kW-hr	1
HC	1.50E-01	g/kW-hr	1, 4
SO ₂	3.08E-06	lb/hp-hr	5
PM	1.70E-01	g/kW-hr	1, 6
PM ₁₀	1.70E-01	g/kW-hr	1, 6
PM _{2.5}	1.70E-01	g/kW-hr	1, 6

Table N-22b. Utilities - Engines - John Deere 83 kW

Pollutant	Potential Emissions (lb/hr) ¹¹	Potential Emissions (tpy)
CO	2.4E-01	5.9E-02
NO _x	6.2E-01	1.6E-01
VOC	2.7E-02	6.9E-03
SO ₂	4.1E-04	1.0E-04
PM	3.1E-02	7.8E-03
PM ₁₀	3.1E-02	7.8E-03
PM _{2.5}	3.1E-02	7.8E-03

Pollutant	Emission Factor (lb/MMBtu) ⁸	Potential Emissions (lb/hr) ⁷	Potential Emissions (tpy)
Benzene	9.33E-04	8.9E-04	2.2E-04
Toluene	4.09E-04	3.9E-04	9.8E-05
Xylenes	2.85E-04	2.7E-04	6.8E-05
Propylene	2.58E-03	2.5E-03	6.2E-04
Formaldehyde	1.18E-03	1.1E-03	2.8E-04
Acetaldehyde	7.67E-04	7.4E-04	1.8E-04
Acrolein	9.25E-05	8.9E-05	2.2E-05
Polycyclic Aromatic Hydrocarbons (PAH)	1.68E-04	1.6E-04	4.0E-05
Max HAP		2.5E-03	6.2E-04
Total HAPs		6.2E-03	1.5E-03

1. Values come from the unit's spec sheet "Kohler Power Systems Model: 80REOZJF". Emissions from EPA Certificate HJDXL04.5119-004.
2. Per 40 CFR 80 Subpart I, maximum sulfur content of ULSD is 15 ppm (i.e. 0.0015%).
3. To convert from gal/hr to MMBtu/hr, an average heat content of diesel of 139,000 btu/gal was used per http://www.engineeringtoolbox.com/energy-content-d_868.html
4. All hydrocarbon (HC) emissions are conservatively assumed to be VOC.
5. SO₂ emission factor from AP-42 Section 3.3, Table 3.3-1 "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines," Supplement B, October 1996.
6. All particulates are assumed to be <1 micron in size, where PM, PM₁₀, 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.
7. Emission Rate (lb/hr) = Rated Capacity (MMBtu/hr or bhp) × Emission Factor (lb/MMBtu or lb/bhp-hr).
8. Emission factors from AP-42 Section 3.3, Table 3.3-2 "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines."

Table N-23. Utilities - Engines - Clarke

Source Designation	Engine
Date Manufactured	TBD
Manufacturer ¹	Clarke
Model No. ²	JW6H-UFAD70
Stroke Cycle ²	4-Stroke
Fuel Used ¹	Diesel
Fuel Sulfur Content (%) ³	0.0015
Rated Horsepower (bhp) ²	399.00
Maximum Fuel Consumption at 100% Load (gal/hr) ²	20.00
Heat Input (MMBtu/hr) ⁴	2.78

Operational Detail	Value
Potential Annual Hours of Operation (hr/yr):	500.00
Potential Fuel Consumption (Mgal/yr):	10.00

Pollutant	Emission Factors	Units	Notes
CO	8.00E-01	g/hp-hr	5
NO _x	2.61	g/hp-hr	5
HC	1.00E-01	g/hp-hr	5,6
SO ₂	3.08E-06	lb/hp-hr	7
PM	1.00E-01	g/hp-hr	5,8
PM ₁₀	1.00E-01	g/hp-hr	5,8
PM _{2.5}	1.00E-01	g/hp-hr	5,8

Table N-26. Utilities - Engines - Clarke

Pollutant	Potential Emissions (lb/hr) ¹⁰	Potential Emissions (tpy)
CO	7.0E-01	1.8E-01
NO _x	2.3	5.7E-01
VOC	8.8E-02	2.2E-02
SO ₂	1.2E-03	3.1E-04
PM	8.8E-02	2.2E-02
PM ₁₀	8.8E-02	2.2E-02
PM _{2.5}	8.8E-02	2.2E-02

Pollutant	Emission Factor (lb/MMBtu) ¹⁰	Potential Emissions (lb/hr) ⁹	Potential Emissions (tpy)
Benzene	9.33E-04	2.6E-03	6.5E-04
Toluene	4.09E-04	1.1E-03	2.8E-04
Xylenes	2.85E-04	7.9E-04	2.0E-04
Propylene	2.58E-03	7.2E-03	1.8E-03
Formaldehyde	1.18E-03	3.3E-03	8.2E-04
Acetaldehyde	7.67E-04	2.1E-03	5.3E-04
Acrolein	9.25E-05	2.6E-04	6.4E-05
Polycyclic Aromatic Hydrocarbons (PAH)	1.68E-04	4.7E-04	1.2E-04
Max HAP		7.2E-03	1.8E-03
Total HAPs		1.8E-02	4.5E-03

1. Client specification.

2. Values come from the unit's spec sheet "Clarke JW6H-UFAD70". Found at http://www.clarkefire.com/Libraries/PDF/Emissions_JW6H-UFADF0_6090HFC47A_1760rpm_2009.sflb.ashx

3. Per 40 CFR 80 Subpart I, maximum sulfur content of ULSD is 15 ppm (i.e. 0.0015%).

4. To convert from gal/hr to MMBtu/hr, an average heat content of diesel of 139,000 btu/gal was used per http://www.engineeringtoolbox.com/energy-content-d_868.html

5. NO_x, HC, CO, and PM emission factors from John Deere "Rating Specific Emissions Data." Found at http://www.clarkefire.com/Libraries/PDF/Emissions_JW6H-UFADF0_6090HFC47A_1760rpm_2009.sflb.ashx

6. To conservatively over-estimate emissions, all hydrocarbon (HC) emissions are assumed to be VOC.

7. SO₂ emission factor from AP-42 Section 3.3, Table 3.3-1 "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines," Supplement B, October 1996.

8. All particulates are assumed to be <1 micron in size, where PM, PM₁₀, 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.

9. Emission Rate (lb/hr) = Rated Capacity (MMBtu/hr or bhp) × Emission Factor (lb/MMBtu or lb/bhp-hr).

10. Emission factors from AP-42 Section 3.3, Table 3.3-2 "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines."

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 R13-3316 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: 0.16 tons per year, Particulate matter less than 2.5 microns: 0.16 tons per year; Particulate matter less than 10 microns: 0.16 tons per year; Sulfur Dioxide: 0 tons per year; Oxides of Nitrogen: 0.39 tons per year; Carbon Monoxide: 0.46 tons per year; Volatile Organic Compounds: 0.24 tons per year; Hazardous Air Pollutants: 0.02 tons per year, including Hexane (0.013 tons per year), Formaldehyde (0.0012 tons per year), Propylene (0.0014 tons per year), and Glycol Ether (0.002 tons per year).

Startup of operation is planned to begin on or about the twenty fourth day of July, 2017. 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 22nd day of June, 2016

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

Procter and Gamble Manufacturing Company • Tabler Station Facility

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	2017	17,150,000 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

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1.0 Emission Units

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

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

Procter and Gamble Manufacturing Company • Tabler Station Facility

1.0 Emission Units

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

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

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1.0 Emission Units

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

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1.0 Emission Units

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

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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		

1.0 Emission Units

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		
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

Procter and Gamble Manufacturing Company • Tabler Station Facility

1.0 Emission Units

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
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

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1.0 Emission Units

181S	150E	Dry Consumer Product Tank	2017	181 gal	N
182S	151E	Dry Consumer Product Tank	2017	181 gal	N
183S	152E	Dry Consumer Product Tank	2017	181 gal	N
184S	153E	Dry Consumer Product Tank	2017	181 gal	N
185S	154E	Dry Consumer Product Tank	2017	181 gal	N
186S	155E	Dry Consumer Product Tank	2017	181 gal	N
187S	156E	Dry Consumer Product Tank	2017	181 gal	N
188S	157E	Dry Consumer Product Tank	2017	181 gal	N
262S	232E	Dry Consumer Products 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	343 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	3994 hp	N

1.0 Emission Units

204S	173E	Fire Pump Engine	2017	3994 hp	N
205S	174E	Emergency Generator	2017	350 kw	N
206S	175E	Emergency Generator	2017	350 kw	N
207S	176E	Emergency Generator	2017	350 kw	N
<u>263S</u>	<u>233E</u>	<u>Emergency Generator</u>	<u>2017</u>	<u>83 kw</u>	<u>N</u>

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
220S	189E	Plastic Pellet Unloading	2017		24C
221S	190E	Plastic Pellet Unloading	2017		25C
222S	191E	Plastic Resin Storage Silo	2017	100,000 tons/yr	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
229SS	198E	Plastic Resin Storage Silo	2017		N
230S	199E	Plastic Resin Storage Silo	2017		N
231S	200E	Plastic Resin Storage Silo	2017		N

1.0 Emission Units

232S	201E	Plastic Resin Storage Silo	2017		N
233S	202E	Plastic Resin Storage Silo	2017		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	70 kw	N
257S	226E	Case Printing Ink	2017	3,430 lb/yr	N
258S	227E	Case Packing Glue	2017	690,080 lb/yr	N

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

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 inspection by the Secretary or his/her duly authorized representative.

3.5.4.2. In accordance with 45CSR30 – Operating Permit Program, enclosed with this permit is a Certified Emissions Statement (CES) Invoice, from the date of initial startup through the following June 30. Said invoice and the appropriate fee shall be submitted to this office no later than 30 days prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with the Section 4.5 of 45CSR22. A copy of this schedule may be found attached to the Certified Emissions Statement (CES) Invoice.

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, 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:

	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

¹ Surfactant startup preheaters vent to scrubber stacks. Emissions are additive to surfactant scrubber emissions.
 West Virginia Department of Environmental Protection • Division of Air Quality

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	--	--	--	--	0.28	1.20	--	--	--	--
Truck and Rail Loading ¹	--	--	--	--	0.02	0.06	--	--	--	--
Liq. Soap Outdoor Tanks	--	--	--	--	0.24	1.70	--	--	--	--
Liq. Soap Indoor Tanks	--	--	--	--	0.17	0.76	--	--	--	--
Liq Soap Packing & Capping	--	--	--	--	0.01	0.01	--	--	--	--
Rotocloners & Liq. Soap Fug.	--	--	--	--	33.23	33.42	4.57	20.06	--	--
Liquid Soap RTO ²	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	--	--	--	--	0.6209	0.7636	--	--	--	--
Dry Cons. Prod. Baghouses/Fab. Filters	--	--	--	--	--	--	3.81	16.71	--	--
Dry Cons. Prod Manufact. Fugitives	--	--	--	--	2.0	8.70	--	--	--	--
Main Facility Boilers	11.301	49.540	0.10	0.41	0.565	2.469	1.17	5.1400	5.780	25.3300
Main Facility Cooling Towers	--	--	--	--	--	--	1.35	5.90	--	--
Main Facility Engines	15.681410	3.9254	0.05	0.02	0.3229	0.087	0.3629	0.097	3.32275	0.8370
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	--	--	--	--	0.14	0.59	--	--	--	--
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	--	--

¹ Less than 0.001 lb/hr potential particulate emissions from surfactant unloading.

² 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.

Plastic Molding Engines	0.42	0.11	0.01	0.01	0.21	0.06	0.01	0.01	0.84	0.21
Total	29,633.22	66,854.6	2.31	1.96	258,527.95	85,214.83	22,241.7	76,715.5	15,514.86	45,194.73

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 rotoclones 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 ~~334~~ 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 ~~28672~~ 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~~three emergency generators (205S, 206S, ~~and~~ 207S, and 263S) and two 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.

4.1.14 Each of the three Caterpillar C15 emergency generators (205S, 206S and 207S) shall not consume more than 28.6 gallons of fuel oil per hour.

4.1.1X The Kohler/John Deere emergency generator (263S) shall not consume more than 6.9 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 ~~20.0+6.13~~ gallons per hour.

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 196 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]**

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 (205)	4.0	3.5	0.20
Emergency Generator (206)	4.0	3.5	0.20
Emergency Generator (207)	4.0	3.5	0.20
Emergency Generator (256)	10 g/hp-hr	387 g/hp-hr	--
<u>Emergency Generator (263)</u>	<u>4.0</u>	<u>5.0</u>	<u>0.30</u>

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

4.1.19 The emergency generators (205S, 206S, ~~and~~ 207S, and 263S) 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)]**

4.1.20 The emergency generators (205S, 206S, ~~and~~ 207S, and 263S) and fire pump engines (203S and 204S) must meet all applicable requirements of 40 CFR 60 Subpart III. **[40 CFR §63.6590(c)(1)]**

4.1.21 The emergency generator (256S) 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.]**