West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Construct

R13-3316

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

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

William F. Durham
Director

Issued: DRAFT

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

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

As a result of this permit, the source is a nonmajor or area source subject to 45CSR30. Therefore, the facility is not subject to the permitting requirements of 45CSR30 and is classified as a deferred source.

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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	39,626 gal	N
21S	21E	Liquid Soap A & B Tank	2017	39,626 gal	N
22S	22E	Liquid Soap A & B Tank	2017	39,626 gal	N
23S	23E	Liquid Soap A & B Tank	2017	7,925 gal	N
24S	24E	Liquid Soap A & B Tank	2017	7,925 gal	N
25S	25E	Liquid Soap A & B Tank	2017	39,626 gal	N
26S	26E	Liquid Soap A & B Tank	2017	15,850 gal	N
27S	27E	Liquid Soap A & B Tank	2017	39,626 gal	N
28S	28E	Liquid Soap A & B Tank	2017	26,417 gal	N
29S	29E	Liquid Soap A & B Tank	2017	15,850 gal	N
30S	30E	Liquid Soap A & B Tank	2017	26,417 gal	N
31S	31E	Liquid Soap A & B Tank	2017	15,850 gal	N

1.0 Emission Units

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

1.0 Emission Units

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

1.0 Emission Units

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

1.0 Emission Units

140S	125E	Preweigh Station	2017	525.6 mmscf/yr	8C
141S		Preweigh Station	2017		
142S		Preweigh Station	2017		
143S		Preweigh Station	2017		
144S		Sampling Station	2017		
145S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
146S	127E	Mixer	2017	918.8 mmscf/yr	9C
147S		Process Tank	2017		
148S		Process Tank	2017		
149S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
150S	128E	Mixer	2017	918.8 mmscf/yr	10C
151S		Process Tank	2017		
152S		Process Tank	2017		
153S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
154S	129E	Mixer	2017	918.8 mmscf/yr	11C
155S		Process Tank	2017		
156S		Process Tank	2017		
157S	126E	Hot Mix Tank	2017	20,611.765 mscf/yr	14C
158S	130E	Mixer	2017	1603.08 mmscf/yr	12C
159S		Process Tank	2017		
160S		Process Tank	2017		
161S	131E	Process Tank	2017	735.84 mmscf/yr	13C
162S		Process Tank	2017		
163S	132E	Dry Consumer Product Tank	2017	42,879 gal	N
164S	133E	Dry Consumer Product Tank	2017	37,641 gal	N
165S	134E	Dry Consumer Product Tank	2017	6,809 gal	N
166S	135E	Dry Consumer Product Tank	2017	396 gal	N
167S	136E	Dry Consumer Product Tank	2017	396 gal	N
168S	137E	Dry Consumer Product Tank	2017	396 gal	N
169S	138E	Dry Consumer Product Tank	2017	181 gal	N
170S	139E	Dry Consumer Product Tank	2017	181 gal	N
171S	140E	Dry Consumer Product Tank	2017	181 gal	N
172S	141E	Dry Consumer Product Tank	2017	181 gal	N
173S	142E	Dry Consumer Product Tank	2017	181 gal	N

1.0 Emission Units

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
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
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	31 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	311 hp	N
204S	173E	Fire Pump Engine	2017	311 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

1.0 Emission Units

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
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

1.0 Emission Units

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

2.0. General Conditions

2.1. Definitions

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

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

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

2.2. Acronyms

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

2.3. Authority

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

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

2.4. Term and Renewal

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

2.5. Duty to Comply

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

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

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

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

2.6. Duty to Provide Information

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

2.7. Duty to Supplement and Correct Information

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

2.8. Administrative Update

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

2.9. Permit Modification

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

2.10. Major Permit Modification

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

2.11. Inspection and Entry

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

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

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

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

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

2.12. Emergency

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

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

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

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

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

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

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

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

the burden of proof.

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

2.13. Need to Halt or Reduce Activity Not a Defense

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

2.14. Suspension of Activities

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

2.15. Property Rights

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

2.16. Severability

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

2.17. Transferability

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

2.18. Notification Requirements

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

2.19. Credible Evidence

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

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

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

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

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

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

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

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

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

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

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

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

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

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

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

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

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

3.4. Recordkeeping Requirements

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

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

3.5. Reporting Requirements

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

information in the document are true, accurate and complete.

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

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

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

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	1.65	1.80	4.24	6.9	23.70	0.06	0.24
Surfactant Startup Preheater	0.78	0.03	0.01	0.01	0.09	0.01	0.12	0.01	1.30	0.05
Surfactant Manufact. Tanks	--	--	--	--	0.28	1.20	--	--	--	--
Truck and Rail Loading	--	--	--	--	0.02	0.06	--	--	--	--
Liq. Soap Outdoor Tanks	--	--	--	--	0.24	1.80	--	--	--	--
Liq. Soap Indoor Tanks	--	--	--	--	0.20	0.80	--	--	--	--
Liq Soap Packing & Capping	--	--	--	--	0.01	0.01	--	--	--	--
Rotoclones & 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	--	--	--	--	0.09	0.36	--	--	--	--
Dry Cons. Prod. Baghouses/Fab. Filters	--	--	--	--	--	--	3.81	16.71	--	--
Dry Cons. Prod Manufact. Fugitives	--	--	--	--	2.0	8.70	--	--	--	--
Main Facility Boilers	11.30	49.50	0.10	0.41	0.55	2.49	1.17	5.00	5.70	25.00
Main Facility Cooling Towers	--	--	--	--	--	--	1.35	5.90	--	--
Main Facility Engines	14.10	3.51	0.05	0.02	0.29	0.07	0.29	0.07	2.75	0.70
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	--	--	--	--	--	--	0.08	0.35	--	--
Plastics Moldings Silos	--	--	--	--	--	--	0.80	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	--	--	--	--	--	--	0.40	1.8	--	--
Plastic Molding Engines	0.42	0.11	0.01	0.01	0.21	0.06	0.01	0.01	0.83	0.21
Total	**29.63**	**66.46**	**2.31**	**2.20**	**257.98**	**85.08**	**19.83**	**78.51**	**14.85**	**44.73**

[1]Surfactant startup preheaters vent to scrubber stacks. Emissions are additive to surfactant scrubber emissions.
[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.

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

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

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

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

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

4.1.8 Boiler Nos. 1 and 2 shall not exceed a heat input of 62 mmbtu/hr each. Boiler No. 3 shall not exceed a heat input of 31 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 272 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 0.005%. Additionally, the total dissolved solids (TDS) content of the cooling tower water shall not exceed 6,000 ppm.

4.1.13 The three emergency generators (205S, 206S and 207S) 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.

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

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

4.1.19 The emergency generators (205S, 206S and 207S) 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 fire pump engines (203S and 204S) must meet all applicable requirements of 40 CFR 60 Subpart IIII. **[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.]**

4.2. Testing Requirements

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

4.2.2 In order to determine compliance with the VOC rotoclone emission limitations of 4.1.2 of this permit, the permittee shall perform EPA approved stack testing on at least one Liquid Soap A and Liquid Soap B rotoclone within 180 days of startup. Said testing shall utilize EPA approved methods unless otherwise approved by the Director.

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

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

4.2.5 In order to determine compliance with the opacity limits of 4.1.11of this permit, the permittee shall conduct visible emission checks and / or opacity monitoring and recordkeeping for each boiler stack.

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

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

c. If visible emissions are present at a source(s) the permittee shall perform Method 9 readings to confirm that visible emissions are within the limits of 4.1.12 of this permit. Said Method 9 readings shall be taken as soon as practicable, but within seventy-two (72) hours of the Method 22 emission check.

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

4.2.6 At least once a month, the permittee shall take a grab sample of the cooling tower circulating water from each cooling tower and verify the total dissolved solids content as limited under 4.1.13of this permit. If one year of monitoring indicates less than 80% of the levels of 4.1.13 are maintained, then the frequency of sampling of cooling tower circulating water can be reduced to quarterly. If, during quarterly sampling, greater than 80% of the levels of 4.1.13 are measured, the frequency of sampling shall be returned to monthly.

4.3. Monitoring and Recordkeeping Requirements

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

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

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

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

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

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

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

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

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

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

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

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

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

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

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

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

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

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

4.3.12 In order to determine compliance with the boiler emission limits of 4.1.2 and the operational limits of 4.1.9 and 4.1.10, Procter and Gamble shall monitor and record the amount and type of fuel consumed by each boiler on at least a monthly basis.

4.3.13 In order to determine compliance with the cooling tower emission limits of 4.1.2 and the operational limits of 4.1.13, Procter and Gamble shall monitor and record the TDS content of the cooling tower water (via either conductivity or lab testing) on at least a monthly basis. If one year of monitoring indicates less than 80% of the levels of 4.1.13 are maintained, then the frequency of sampling of the cooling tower circulating water can be reduced to quarterly. If, during quarterly sampling, greater than 80% of the levels of 4.1.13 are measured, the frequency of sampling shall be returned to monthly.

4.3.14 In order to determine compliance with all Reciprocating Internal Combustion Engine (RICE) emission limits of 4.1.2 and the operational limits of 4.1.14, 4.1.15, 4.1.16, 4.1.17. 4.1.18, 4.1.19 and 4.1.20,

Procter and Gamble shall monitor and record the number of hours of operation of each RICE on at least a monthly basis, the type and amount of fuel consumed by each RICE on at least a monthly basis, and the sulfur content of any fuel oil consumed by any RICE.

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

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

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

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

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

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

4.4. Reporting Requirements

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

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

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

CERTIFICATION OF DATA ACCURACY

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

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

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

Telephone No._____ Fax No. _____

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

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

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

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

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

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

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