OhioEPA
State of Ohio Environmental Protection Agency

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P001, P002, P005, P021, P022, P023

George V. Voinovich
Governor

Donald R. Schregardus
Director

Re: Permit to Install
Seneca County
Application No: 03-6955

CERTIFIED MAIL

June 3, 1993

CHURCH & DWIGHT CO, INC
JIM DYNES
P O BOX 122
OLD FORT, OH 44861-0122

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
NORTHWEST DISTRICT OFFICE, DAPC

Printed on recycled paper

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 03-6955
APS Premise No. 0374000022
Permit Fee: $2360.00

Name of Facility: CHURCH & DWIGHT CO, INC

Person to Contact: JIM DYNES

Address: P O BOX 122
OLD FORT, OH 44861-0122

Location of proposed source(s): 2501 E COUNTY RD 34
OLD FORT, OHIO

Description of proposed source(s):
MODIFICATION OF SODIUM BICARBONATE PROCESS TO INCREASE PRODU CTION BY 75,000 TONS/YR.

Date of Issuance: June 3, 1993

Effective Date: June 3, 1993

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months, if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a $15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for CHURCH & DWIGHT CO, INC located in Seneca County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification/ Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and/ or Control & Usage Requirements
P001	Liquor Prep. With Scrubber	Use of a Scrubber	3745-31-05 3745-17-07 3745-17-11	<0.1 lb/hr PM
P002	Crystal Formation With Scrubber and Carbonator Vent	Use of a Scrubber	3745-31-05 3745-17-07 3745-17-11	5.04 lbs/day PM
P005	Classification, Conveying and Bagging With (3) Baghouses	Use of a Baghouse	3745-31-05 3745-17-07 3745-17-11	7.54 lbs/hr PM
P021	Soda Ash Unload-ing With Baghouse	Use of a Baghouse	3745-31-05 3745-17-07 3745-17-11	0.22 lb/hr PM
P022	Crystal Separa-tion #2 With No Controls	Compliance With Terms and Conditions Of This Permit	3745-31-05 3745-17-07 3745-17-11	<0.1 lb/hr PM
P023	Dryer #2 With (2) Scrubbers and (1) Cyclone	Use of a Cyclone and Scrubbers. (Closed System, Recycled Recovered Material)	3745-31-05 3745-17-07 3745-17-11	0.01 lb/hr PM

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
PM	35.72

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

1. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

3. Tests shall be performed for the following sources and pollutants:

Source	Pollutant(s)
P001	TSP

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Northwest District Office, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance test conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

For source numbers P001 and P002, Church & Dwight Co., Inc. shall properly install, operate and maintain equipment to monitor the pressure drop (inches of water column) of the gas stream across the scrubber and the volume flow rate of the scrubbing liquor into the scrubber. The company shall operate the scrubbers at all times in accordance with the following parameters:

a. P001 not less than 3 inches pressure drop

   P002 not less than 2 inches pressure drop

b. P001 not less than 4 gallons per minute scrubbing liquor volume

   P002 not less than 1.3 gallons per minute scrubbing liquor volume.

The pressure drop and scrubbing liquor volume shall be recorded once per day while the sources are in operation. In conjunction with the above, the company shall keep a maintenance log for the scrubber systems which, at a minimum, details all instances when the system is not operating properly and/or the pressure drop or scrubbing liquor volume falls below the level specified in Condition #1. It should include the date and time the problem(s) were first noticed, the corrective action taken, and the date and time the problems were corrected. These records shall be retained in the company's files for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.