



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL  
GUERNSEY COUNTY  
Application No: 06-03650

DATE: 10/17/2002

Colgate Palmolive Co Cambridge Plant  
Anthony Veltri  
8800 Guernsey Industrial Blvd  
Cambridge, OH 43725

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 1925** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

SEDO

WV

PA



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 06-03650**

Application Number: **06-03650**  
APS Premise Number: **0630010015**  
Permit Fee: **\$ To be entered upon final issuance**  
Name of Facility: **Colgate Palmolive Co Cambridge Plant**  
Person to Contact: **Anthony Veltri**  
Address: **8800 Guernsey Industrial Blvd  
Cambridge, OH 43725**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**8800 Guernsey Industrial Blvd  
Cambridge, OHIO**

Description of modification:  
**Administrative modification to PTI 06-3650 issued 6/9/93 to change the source descriptions.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**Colgate Palmolive Co Cambridge Plant**

Facility ID: **0630010015**

**PTI Application: 06-03650**

**Modification Issued: To be entered upon final issuance**

## **GENERAL PERMIT CONDITIONS**

### **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 SOURCES**

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 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 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 30 days of the effective date of this permit to install.

Colgate Palmolive Co Cambridge Plant

Facility ID: 0630010015

PTI Application: 06-03650

Modification Issued: To be entered upon final issuance

### **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 AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

**Colgate Palmolive Co Cambridge Plant**

**PTI Application: 06-03650**

**Modification Issued: To be entered upon final issuance**

Facility ID: **0630010015**

**Colgate Palmolive Co Cambridge Plant**  
**PTI Application: 06-03650**  
**Modification Issued: To be entered upon final issuance**

Facility ID: **0630010015**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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**AIR EMISSION SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **Colgate Palmolive Co Cambridge Plant** located in **GUERNSEY** County. The emissions units 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.

	T007			
		T012		T022 Cont'd
			T018	T023
T001	T008			
		T014	T019	T024
T002	T008 Cont'd			
	T009			
		T015	T020	T026
T003				
	T010			
		T016	T021	T027
T006				
	T011			
		T017	T022	T028

**Colgate Palmolive Co Cambridge Plant**  
**PTI Application: 06-03650**  
**Modification Issued: To be entered upon final issuance**

Facility ID: **0630010015**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T029	T036	Source Identification <u>Description</u> 20,000 Gallon Caustic Storage Tank (T-503)	30,000 Gallon Detergent Raw Material Solution Storage Tank (T-517) 20,000 Gallon Detergent Raw Material Solution Storage Tank (T-520)	Material Solution Storage Tan (T-550) 18,000 Gallon Sulfur Storage Tank (T-901) 20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908A)
T030	T037	30,000 Gallon Detergent Raw Material Solution Storage Tank (T-504)	20,000 Gallon Detergent Raw Material Solution Storage Tank (T-521)	20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908B)
T032	T037 Cont'd T038	30,000 Gallon Detergent Raw Material Solution Storage Tank (T-507)	15,000 Gallon Detergent Raw Material Solution Storage Tank (T-523)	20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908C)
T033		30,000 Gallon Detergent Raw Material Solution Storage Tank (T-510)	15,000 Gallon Detergent Raw Material Solution Storage Tank (T-524)	20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908D)
T034		39,650 Gallon Detergent Raw Material Solution Storage Tank (T-514)	20,000 Gallon Detergent Raw Material Solution Storage Tank (T-526)	20,000 Gallon Detergent Raw Material Solution Storage Tank
T035		30,000 Gallon Detergent Raw Material Solution Storage Tank (T-516)	12,200 Inorganic Detergent Intermediate	20,000 Gallon Detergent Raw Material Solution Storage Tank

**Colgate Palmolive Co Cambridge Plant**  
**PTI Application: 06-03650**  
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Facility ID: **0630010015**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
(T-908E)	Gallon Detergent Raw Material Solution Storage Tank (T-908J)	Detergent Raw Material Solution Storage Tank (T-502)		
20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908F)	20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908K)	40,000 Gallon Detergent Raw Material Solution Storage Tank (T-910)	BAT <u>Determination</u> No Control Required	Submerged Fill
20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908H)	27,000 Gallon Detergent Raw Material Solution Storage Tank (T-908L)	40,000 Gallon Detergent Raw Material Solution Storage Tank (T-914)	Submerged Fill and Conservation Vent No Control Required	Submerged Fill
20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908I)	14,500 Gallon Ammonia Storage Tank (T-930)		Submerged Fill	Submerged Fill and Conservation Vent
20,000 Gallon Detergent Raw Material Solution Storage Tank (T-908I)	80,000 Gallon Detergent Raw Materials Solution Storage Tank (T-501)		No Control Required	Submerge Fill
20,000	60,000 Gallon		Submerged Fill	

**Colgate Palmolive Co Cambridge Plant**  
**PTI Application: 06-03650**  
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Facility ID: **0630010015**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Submerged Fill and Conservation Vent	Submerged Fill	Vent Submerged Fill and Conservation Vent	No Control Required	Applicable Federal & OAC Rules 3745-31-05 (A)(3)
Submerged Fill	Submerged Fill	Submerged Fill	No Control Required	3745-31-05(A)(3) 40 CFR 60 Subpart Kb
Submerged Fill	Submerged Fill	Submerged Fill	No Control Required	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
Submerged Fill	Submerged Fill	Submerged Fill and Conservation Vent	No Control Required	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
Submerged Fill	Submerged Fill	Submerged Fill and Vapor Recovery System When Loading	No Control Required	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb
Submerged Fill	Submerged Fill and Conservation		No Control Required	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb

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Facility ID: **0630010015**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	40 CFR 60 Subpart Kb	Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	
3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb			
3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31005 (A)(3) 40 CFR 60 Subpart Kb
3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31005 (A)(3) 40 CFR 60 Subpart Kb
3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3)	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31005 (A)(3) 40 CFR 60 Subpart Kb
3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05(A)(3)	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31-05 (A)(3) 40 CFR 60 Subpart Kb	3745-31005 (A)(3) 40 CFR 60 Subpart Kb
3745-31-05 (A)(3)	3745-31-05 (A)(3) 40 CFR 60		3745-31-05 (A)(3)	

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Facility ID: **0630010015**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Permit Allowable Mass Emissions and/or Control/Usage Requirements	Required Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible	Emissions are Negligible	Conservation Vent 0.33 TPY OC
	Submerged Fill Annual Emissions are Negligible	Submerged Fill and Conservation Vent 1.82 TPY OC	Submerge Fill Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible
No Control Required Annual Emissions are Negligible	No Control Required Annual Emissions are Negligible	Submerge Fill Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible	Submerged Fill and Conservation Vent 1.82 TPY OC
Submerged Fill and Conservation Vent Annual Emissions are Negligible	Submerged Fill Annual Emissions are Negligible	Submerge Fill and Conservation Vent 0.33 TPY OC	Submerged Fill Annual Emissions are Negligible	Submerged Fill and Conservation Vent 1.82 TPY OC
	Submerged Fill Annual Emissions are Negligible	Submerged Fill Annual Emission are Negligible	Submerged Fill and Conservation Vent 0.51 TPY OC	Submerged Fill Annual Emissions are Negligible
	Submerged Fill Annual Emissions are Negligible	Submerge Fill Annual Emissions are Negligible	Submerged Fill and Conservation Vent 0.51 TPY OC	Submerged Fill Annual Emissions are Negligible
No Control	Submerged Fill Annual Emissions are Negligible	Submerge Fill Annual	Submerged Fill and	Submerged Fill and

**Colgate Palmolive Co Cambridge Plant**  
**PTI Application: 06-03650**  
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Facility ID: **0630010015**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Conservation Vent Annual Emissions are Negligible	Annual Emissions are Negligible			
Submerged Fill and Vapor Recovery System When Loading 0.26 TPY Ammonia	No Control Required Annual Emissions are Negligible			
No Control Required Annual Emissions are Negligible	No Control Required Annual Emissions are Negligible			
No Control Required				

Colgate Palmolive Co Cambridge Plant

Facility ID: 0630010015

PTI Application: 06-03650

Modification Issued: To be entered upon final issuance

**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds	7.63
Ammonia	0.26

**NSPS REQUIREMENTS**

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>
T021	
T022	
T002	30,000 Gallon Detergent Raw Material Solution Tank
T023	
T003	30,000 Gallon Detergent Raw Material Solution Tank
T024	
T006	30,000 Gallon Detergent Raw Material Solution Tank
T026	
T007	39,000 Gallon Detergent Raw Material Solution Tank
T027	
T008	39,000 Gallon Detergent Raw Material Solution Tank
T028	
T009	30,000 Gallon Detergent Raw Material Solution Tank (1)
T029	
T010	30,000 Gallon Detergent Raw Material Solution Tank (2)
T030	
T011	20,000 Gallon Detergent Raw Material Solution Tank
T032	
T012	20,000 Gallon Detergent Raw Material Solution Tank
T034	
T014	15,000 Gallon Detergent Raw Material Solution Tank
T035	
T015	15,000 Gallon Detergent Raw Material Solution Tank
T036	
T016	20,000 Gallon Detergent Raw Material Solution Tank
T037	
T019	20,000 Gallon Detergent Raw Material Solution Tank (1)
T038	
T020	20,000 Gallon Detergent Raw Material Solution Tank (2)



**Colgate Palmolive Co Cambridge Plant**  
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Facility ID: **0630010015**

Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Air Quality Modeling and Planning  
P.O. Box 1049  
Columbus, OH 43216-1049

and SEDO

**Colgate Palmolive Co Cambridge Plant**  
**PTI Application: 06-03650**  
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Facility ID: **0630010015**

### **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 three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

### **REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Southeast District Office , 2195 Front Street, Logan, Ohio 43138.**

### **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 **Southeast District Office , 2195 Front Street, Logan, Ohio 43138.**

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.

**Colgate Palmolive Co Cambridge Plant**

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**Modification Issued: To be entered upon final issuance**

**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.

**NEW SOURCE PERFORMANCE STANDARD SUBPART Kb**

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

<u>Source Number(s)</u>	<u>Tank Size</u>
T002	30,000 Gal
T003	30,000 Gal
T006	30,000 Gal
T007	39,000 Gal
T008	39,000 Gal
T009	30,000 Gal
T010	30,000 Gal
T011	20,000 Gal
T012	20,000 Gal
T014	15,000 Gal
T015	15,000 Gal
T016	20,000 Gal
T019	20,000 Gal
T021	20,000 Gal
T022	20,000 Gal
T023	20,000 Gal
T024	20,000 Gal
T026	27,000 Gal
T027	27,000 Gal
T028	27,000 Gal
T029	27,000 Gal
T030	27,000 Gal
T032	30,000 Gal
T034	80,000 Gal
T035	60,000 Gal
T036	40,000 Gal
T037	40,000 Gal
T038	40,000 Gal