John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

2/12/2013

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Jason Trausch
Church & Dwight Co.
2501 East County Road 34
Old Fort, OH 44861

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0374000022
Permit Number: P0112339
Permit Type: Administrative Modification
County: Seneca

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Church & Dwight Co.

Facility ID:	0374000022
Permit Number:	P0112339
Permit Type:	Administrative Modification
Issued:	2/12/2013
Effective:	2/12/2013

Division of Air Pollution Control
Permit-to-Install
for
Church & Dwight Co.

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Authorization

Facility ID:	0374000022
Facility Description:	Sodium bicarbonate manufacturing.
Application Number(s):	A0045932
Permit Number:	P0112339
Permit Description:	Administrative modification to establish VOC emission limits for P027 and P039. There are no production modifications associated with this permit.
Permit Type:	Administrative Modification
Permit Fee:	$1,125.00
Issue Date:	2/12/2013
Effective Date:	2/12/2013

This document constitutes issuance to:

Church & Dwight Co.
2501 East County Road 34
Old Fort, OH 44861

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 emissions unit(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 emissions unit(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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112339
Permit Description: Administrative modification to establish VOC emission limits for P027 and P039. There are no production modifications associated with this permit.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P027**
Company Equipment ID:	P027
Superseded Permit Number:	03-14013
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P039**
Company Equipment ID:	P039
Superseded Permit Number:	03-13515
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. P027

Operations, Property and/or Equipment Description:

Carpet Deodorizer Manufacturing Line - dense phase transfer, pre-blend addition, perlite addition, and packaging with product recovery baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d. and d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.03 grain particulate matter ≤ 10 microns in size (PM_{10})/dry standard cubic foot 0.65 pound PM_{10}/hour 2.85 tons PM_{10}/year 4.35 tons volatile organic compounds (VOC) per 12-month, rolling period Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	ORC 3704.03(F) and OAC rule 3745-114	See d)(3).

(2) Additional Terms and Conditions

a. The baghouse associated with this emissions unit has been determined to be process equipment and is employed primarily for product recovery purposes.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of fragrances employed in this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(P_i)] \div 2000 \text{ pounds/ton} \leq 4.35 \text{ tons VOC/year}$$

Where,

M = the increment of the rolling, 12-month period;

V_i = VOC emission factor, in pounds VOC per ton product, of each fragrance employed;

P_i = production rate, in tons, for the rolling, 12 month period; and

n = total number of unique fragrances employed in the emissions unit.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC emission rate upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[As the facility is currently configured, this emissions unit shares a common egress point/stack with emissions unit P039. As such, the above monitoring and recordkeeping requirement will be satisfied provided the facility meets the duplicative monitoring and recordkeeping requirement specified for emissions unit P039.]

(2) In order to demonstrate compliance with the 12-month, rolling emission limitation, the permittee shall collect and record the following information each month for this emissions unit:

a. the name of each fragrance employed;

b. the vapor pressure, in mm Hg at 20° C, of each fragrance employed;

c. the VOC emission factor, in pound(s) VOC per ton product, of each fragrance employed;

d. the cat/carpet deodorizer production rate, in tons, during the timeframe each fragrance was employed;

e. the emission rate, in pound(s), from each fragrance [d)(1)c. times d)(1)d.];

f. the total emission rate from all fragrances employed, in ton(s) [summation of d)(1)e. divided by 2,000 pounds/ton]; and

g. the total cumulative VOC emissions during the rolling, 12-month period, in ton(s) [summation of VOC emissions, as recorded in d)(1)f., for the present month plus the previous 11 months of operation].

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials,or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

(3) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.03 grain PM_{10}/dry standard cubic foot

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

b. Emission Limitation:

0.65 pound PM_{10}/hour

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit of this emissions unit and can be calculated using the following equation:

0.03 gr PM_{10} (1)	2525 dscf (2)	1 pound (3)	60 minutes (3)
dscf	minute	7000 grains	hour

Where:

(1) Maximum outlet grain loading of the baghouse, as supplied in the permit application.

(2) Maximum outlet gas flow rate of the baghouse, as supplied in the permit application.

(3) Conversion factors.

If required, compliance with this emission limitation shall be demonstrated in accordance with the test methodsand procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

c. Emission Limitation:

2.85 tons PM_{10}/year

Applicable Compliance Method:

The annual emission limitation was calculated using the following equation:

0.65 pound PM_{10} (1)	8760 hours (2)	1 ton (3)
hour	year	2000 pounds

Where:

(1) Hourly emission limitation.

(2) Maximum, annual operating schedule.

(3) Conversion factor.

Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:
4.35 tons VOC per rolling, 12-month period

Applicable Compliance Method:
The annual emission limitation was established in accordance with the following equation:

0.088 pound VOC (1)	98,848 tons (2)	1 ton (3)
ton product	year	2000 pounds

Where:

(1) Company-supplied emission factor based on emission testing conducted at the York Davies Church & Dwight Facility on 8/31/2011.

(2) Maximum, annual cat/carpet deodorizer line production rate, as provided in the permit application.

(3) Conversion factor.

The permittee shall demonstrate compliance with the 12-month, rolling VOC emission limitation in accordance with the recordkeeping requirements established in d)(2).

e. Emission Limitation:
Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.

2. P039

Operations, Property and/or Equipment Description:

Cat Litter Manufacturing Line – material receiving, handling, mixing, and packaging (with baghouse)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d. and d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.01 grain particulate matter ≤ 10 microns in size (PM_{10})/dry standard cubic foot 0.62 pound PM_{10}/hour 2.72 tons PM_{10}/year 12.11 tons volatile organic compounds (VOC) per 12-month, rolling period Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	ORC 3704.03(F) and OAC rule 3745-114	See d)(3).

(1) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse that is capable of achieving 0.01 grain PM_{10}/dry standard cubic foot.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of fragrances and paints employed in this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(P_i)] \div 2000 \text{ pounds/ton} \leq 12.11 \text{ tons VOC/year}$$

Where,

M = the increment of the rolling, 12-month period;

V_i = VOC emission factor, in pounds VOC per ton product, of each fragrance employed <u>OR</u> VOC content, in pounds VOC/gallon, of each paint employed, as applicable;

P_i = production rate, in tons, <u>OR</u> gallon usage rate, for the rolling, 12 month period, as applicable; and

n = total number of unique fragrances and paints employed in the emissions unit.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC emission rate upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[As the facility is currently configured, this emissions unit shares a common egress point/stack with emissions unit P027. As such, the above monitoring and recordkeeping

requirement will be satisfied provided the facility meets the duplicative monitoring and recordkeeping requirement specified for emissions unit P027.]

(2) In order to demonstrate compliance with the 12-month, rolling emission limitation, the permittee shall collect and record the following information each month for this emissions unit:

a. the name of each fragrance employed;

b. the vapor pressure, in mm Hg at 20° C, of each fragrance employed;

c. the VOC emission factor, in pound(s) VOC/ton product, of each fragrance employed;

d. the cat litter manufacturing line production rate, in tons/month, during the timeframe each fragrance was employed;

e. the VOC emission rate, in pound(s)/month, from each fragrance [d)(1)c. times d)(1)d.];

f. the name and identification number of each paint employed;

g. the VOC content of each paint employed, in pounds VOC/gallon;

h. the number of gallons of each paint employed, in gallons/month;

i. the VOC emission rate, in pound(s)/month, from each paint employed [d)(1)g. times d)(1)h.];

j. the total VOC emission rate from all fragrances and paints employed, in ton(s)/month [summation of d)(1)e. and d)(1)i. divided by 2,000 pounds/ton]; and

k. the total cumulative VOC emissions during the rolling, 12-month period [summation of VOC emissions, as recorded in d)(1)j., for the present month plus the previous 11 months of operation], in ton(s).

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials,or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

(3) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

a. The permittee shall also identify in the semiannual reports:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

ii. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.01 grain PM_{10}/dry standard cubic foot

Applicable Compliance Method:

If required, compliance with the emission limitation shall be demonstrated in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

b. Emission Limitation:

0.62 pound PM_{10}/hour

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit of this emissions unit and can be calculated using the following equation:

0.01 gr PM_{10} (1)	7200 dscf (2)	1 pound (3)	60 minutes (3)
dscf	minute	7000 grains	hour

Where:

(1) Maximum outlet grain loading of the baghouse, as supplied in the permit application.

(2) Maximum outlet gas flow rate of the baghouse, as supplied in the permit application.

(3) Conversion factors.

If required, compliance with these emission limitations shall be demonstrated in accordance with the test methodsand procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and in 40 CFR, Part 51, Appendix M, Methods 201/201A and 202.

c. Emission Limitation:

2.72 tons PM_{10}/year

Applicable Compliance Method:

The annual emission limitation was calculated using the following equation:

0.62 pound PM_{10} (1)	8760 hours (2)	1 ton (3)
hour	year	2000 pounds

Where:

(1) Hourly emission limitation.

(2) Maximum, annual operating schedule.

(3) Conversion factor.

Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:
12.11 tons VOC per rolling, 12-month period

Applicable Compliance Method:
The annual emission limitation was established as a summation of the maximum annual emission rates from the use of fragrances and paints in this emissions unit, as follows:

11.66 tons VOC from fragrances	+	0.45 ton VOC from paints
year		year

i. Fragrances:

0.088 lb VOC (1)	164250 tons (2)	1 ton (3)	+	0.018 lb VOC (1)	492750 tons (2)	1 ton (3)
ton	year	2000 lbs		ton	year	2000 lbs

Where:

(1) Company-supplied emission factors based on emission testing conducted at the York Davies Church & Dwight Facility on 8/31/2011.

(2) Maximum, annual cat/carpet deodorizer line production rates. The company is assuming that 75% of the fragrances used are ≤ 0.018 pound VOC/ton and 25% of the fragrances used are > 0.018 pound VOC/ton and ≤ 0.088 pound VOC/ton.

(3) Conversion factor.

ii. Paints:

0.01 lb VOC (1)	10.3 gallons (2)	8760 hours (3)	1 ton (4)
gallon	hour	year	2000 lbs

Where:

(1) Maximum VOC content of paints employed, as specified in the permit application.

(2) Maximum, hourly gallon usage rate of paints, as specified in the permit application.

(3) Maximum, annual operating schedule.

(4) Conversion factor.

The permittee shall demonstrate compliance with the 12-month, rolling VOC emission limitation in accordance with the recordkeeping requirements established in d)(2).

e. Emission Limitation:
Visible particulate emissions from each stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.