

Statement of Basis For Title V Permit

Company Name	Church & Dwight Company	
Premise Number	03 74 00 0022	
What makes this facility a Title V facility?	PM	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
none			

C Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

Part III (Requirements Within the State & Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
F001	None	17-08 (B)		Y	N	N	N	N	N	N	N	N	N	N	17-08 n/a - not in an "Appendix A" area for fugitive PE 17-07 n/a by rule if 17-08 is not applicable 31-05 - no specific requirements established under BAT (note: emissions unit application pre-dates 17-08 'RACM' fugitive PE requirements)
P027 P031 P033 P034 P036 P039 P901	1.25 lb/hr* 1.42 lb/hr* 1.29 lb/hr* 1.72 lb/hr* 0.86 lb/hr* 0.62 lb/hr* 7.54 lb/hr* * of PE	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M -Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 10
P033 P034 P036 P039 P901	5.63 ton PE /yr 7.53 ton PE /yr 3.77 ton PE /yr 2.72 ton PE /yr 33.0 ton PE /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	Note: The tons/yr limitations were developed by multiplying the lbs/hr limitation by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

P010	13.7 lb/hr PE	17-11		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 10
P010 P033 P034 P036 P039	0.03 grain* 0.02 grain* 0.02 grain* 0.02 grain* 0.01 grain* * PE per DSCF	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions standard. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 10
P010 P027 P031 P901	20 % opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PM control, and therefore indication of ongoing compliance with the opacity limit. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None normally required for opacity alone.
P033 P034 P036 P039	0 % opacity	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None - per Ohio EPA Engineering Guide 10

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C **Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.

4. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.