



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

04/29/03

**RE: Proposed Title V Chapter 3745-77 Permit**  
**03-74-00-0022**  
**Church & Dwight Co.**

Attn: Genevieve Damico AR-18J  
United States Environmental Protection Agency  
Region V  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Church & Dwight Co., has been created in Ohio EPA's State Air Resources System (STARS) on 04/29/03, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

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

cc: Northwest District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 04/29/03	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-74-00-0022 to:  
Church & Dwight Co.  
2501 East County Road 34  
Old Fort, OH 44861

**Emissions Unit ID (Company ID)/Emissions Unit Activity Description**

F001 (F001) Fugitive Emissions From Traffic	Non USP Bagger	P039 (P039) Cat Litter Manufacturing Line
P010 (P010/P025) North Megalac Bulk Reaction Conveyor and Bagging	P033 (P033) Megalac Curing Bins	P901 (P901) Classification, Conveying and Bagging with Baghouse (previously P005)
P027 (P027, P028, P029, P030 (P027)) Active Process - Cat/Carpet Deodorizer Elevator and Bin (Combined in with P028, P029, P030)	P034 (P034, P035) South Megalac Reactor Cooling (tied into P035)	
P031 (P031)	P036 (P036) South Megalac Process Reactor	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **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:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- 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 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c. The permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
    - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the

requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))*

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))*

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record

keeping, and reporting requirements. 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.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- iv. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

## **2. 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 of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, 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 emissions unit(s) that is (are) served by such control system(s).

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))*

## **3. 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.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **4. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **5. Severability Clause**

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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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.
- (Authority for term: OAC rule 3745-77-07(A)(7))*

**7. 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.  
*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.  
*(Authority for term: OAC rule 3745-77-07(A)(9))*

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.  
*(Authority for term: OAC rule 3745-77-07(A)(10))*

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

#### **11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

#### **12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.
- b. 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:
  - i. 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.
  - ii. 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 paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

#### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

#### **16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.) *(Authority for term: OAC rule 3745-77-07(I))*

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.  
*(This term is provided for informational purposes only.)*

**18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**19. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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., 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.)

**2. Records Retention Requirements**

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.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

**5. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforcable Section

None

### B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Boiler #3 - 7.32 mmBtu/hr, Natural Gas-Fired Boiler, Ohio EPA emissions unit B001;  
Boiler #2 - 7.32 mmBtu/hr, Natural Gas-Fired Boiler, Ohio EPA emissions unit B002;  
Boiler #1 - 7.32 mmBtu/hr, Natural Gas-Fired Boiler, Ohio EPA emissions unit B003;  
Boiler #4 - 7.32 mmBtu/hr, Natural Gas-Fired Boiler, Ohio EPA emissions unit B004;  
Boiler #7 - 7.32 mmBtu/hr, Natural Gas-Fired Boiler, Ohio EPA emissions unit B007;  
Liquor Preparation #1, Ohio EPA emissions unit P001;  
Crystal Form, with Scrubber, Ohio EPA emissions unit P002;  
Crystal Separation #1, Ohio EPA emissions unit P003;  
Drying #1, Ohio EPA emissions unit P004;  
Lime Storage and Transfer, Ohio EPA emissions unit P007;  
Megalac Cooler, Ohio EPA emissions unit P011;  
Megalac Convey, Screen, Mill, Supersack, Ohio EPA emissions unit P012;  
Treated Free-Flowing (TFF) Bulk Load, Ohio EPA emissions unit P013;  
1# Packaging Line, Ohio EPA emissions unit P014;  
Flow K, Ohio EPA emissions unit P015;  
Megalac Central Vacuum System, Ohio EPA emissions unit P016;  
TFF Bagging (is now tied to P031), Ohio EPA emissions unit P017;  
D-5 Packline, Ohio EPA emissions unit P018;  
North Megalac Bin Curing Systems, Ohio EPA emissions unit P019;  
  
Megalac Bulk Truck and Rail Loading, Ohio EPA emissions unit P020;  
Soda Ash Unloading with Baghouse, Ohio EPA emissions unit P021;  
Crystal Separation #2, Ohio EPA emissions unit P022;  
Drying #2, Ohio EPA emissions unit P023;  
Armex Manufacturing, Ohio EPA emissions unit P024;  
2/4# Packing Line (tied into P014), Ohio EPA emissions unit P026;  
Armex Profile Dry Blend, Ohio EPA emissions unit P032;  
Protein Unloading, Ohio EPA emissions unit P037;  
Megalac Boiler -7.32 mmBtu/hr, Natural Gas-Fired Boiler, Ohio EPA emissions unit Z001; and  
Boiler #6 - 7.32 mmBtu/hr, Natural Gas-Fired Boiler, Ohio EPA emissions unit Z002.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** F001 (F001)  
**Activity Description:** Fugitive Emissions From Traffic

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plant roadways and parking areas (F001)	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.
	OAC rule 3745-31-05(A)(3) PTI 03-673	See A.I.2.c below.

**2. Additional Terms and Conditions**

- 2.a This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Seneca County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c No emission limitations or control requirements were established under this rule in PTI #03-673.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** P010/P025 (P010)

**Activity Description:** North Megalac Bulk Reaction Conveyor and Bagging

### A. State and Federally Enforceable Section

#### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MEGALAC reaction conveyor and bagging, equipped with baghouse (P010)	OAC rule 3745-17-11(B)(1)	13.7 lbs/hr of particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) PTI 03-2679	0.03 grain PE per dry standard cubic feet (dscf)  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).

#### 2. Additional Terms and Conditions

- 2.a All PE from this emissions unit shall be vented to the baghouse.

#### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water\* while the emissions unit is in operation.

\* The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from 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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
13.7 lbs PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE by multiplying the maximum outlet PE concentration (0.03 gr/dscf) by the maximum exhaust flow rate (dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with OAC rule 3745-17-03(B)(10).

[The permittee demonstrated compliance with the hourly allowable PE limitation on November 9, 1996. The tested PE was 0.3 lb PE/hr (0.008 gr/dscf). Further testing to demonstrate compliance with hourly allowable PE limitation shall be conducted in accordance with Engineering Guide #16.]

- 1.b Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- 1.c Emission Limitation:  
0.03 gr PE/dscf

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[The permittee demonstrated compliance with the hourly allowable PE limitation on November 9, 1996. The tested PE was 0.3 lb PE/hr (0.008 gr/dscf). Further testing to demonstrate compliance shall be conducted in accordance with Engineering Guide #16.]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** P027, P028, P029, P030 (P027) (P027)

**Activity Description:** Active Process - Cat/Carpet Deodorizer Elevator and Bin (Combined in with P028, P029, P030)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
carpet deodorizer manufacturing - dense phase transfer, pre-blend addition, perlite addition, and packaging, equipped with 2 baghouses (P027)	OAC rule 3745-31-05(A)(3) PTI 03-14013	1.33 lbs/hr of particulate emissions (PE), 5.83 tons PE/yr  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).

##### 2. Additional Terms and Conditions

- All PE from this emissions unit shall be vented to the 2 baghouses.

##### II. Operational Restrictions

- The pressure drop across each baghouse shall be maintained within the range of 2 to 8 inches of water\* while the emissions unit is in operation.

\* The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

##### III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across each process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across either baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
1.33 lbs PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum outlet PE concentration (0.03 gr/dscf) by the maximum exhaust flow rate (5,175 dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

- 1.b Emission Limitation:  
5.83 ton PE/year

Applicable Compliance Method:

The annual PE limitation was developed by multiplying the hourly PE limitation by of 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- 1.c Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** P031 (P031)  
**Activity Description:** Non USP Bagger

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
carousel bagger (non-USP), equipped with a baghouse (P031)	OAC rule 3745-31-05(A)(3) PTI 03-8045	1.42 lbs/hr of particulate emissions (PE)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).

##### 2. Additional Terms and Conditions

- 2.a All PE from this emissions unit shall be vented to the baghouse.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8\* inches of water while the emissions unit is in operation.  
  
\* The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from 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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
1.42 lbs PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum outlet PE concentration (0.03 gr/dscf) by the maximum exhaust flow rate (5,000 dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

- 1.b Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** P033 (P033)  
**Activity Description:** Megalac Curing Bins

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MEGALAC production - 3 curing bins, equipped with 3 baghouses (P033)	OAC rule 3745-31-05(A)(3) PTI 03-13167	1.29 lbs/hr of particulate emissions (PE), 5.63 tons PE/yr  0.02 gr PE/dscf  Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	See A.I.2.a. The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3475-31-05 (A)(3).
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be use of 3 baghouses for the control of PE.
- 2.b All PE from this emissions unit shall be vented to the 3 baghouses.

##### II. Operational Restrictions

1. The pressure drop across each process baghouse shall be maintained within the range of 2 to 8 inches of water\* while the emissions unit is in operation.

\*The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from 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 and location of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the baghouses did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitations:  
1.29 lbs/hr PE, 5.63 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE by multiplying the maximum outlet PE concentration (0.02 gr/dscf) by the maximum exhaust flow rate (7,500 dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The tons/yr limitation was 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.

- 1.b Emission Limitation:  
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- 1.c Emission Limitation:  
0.02 grain PE/dscf

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Facility Name: **Church & Dwight Co., Inc**  
Facility ID: **03-74-00-0022**  
Emissions Unit: **P033 (P033)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** P034, P035 (P034)

**Activity Description:** South Megalac Reactor Cooling (tied into P035)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MEGALAC production - reactor cooling, conveying, and milling, equipped with a baghouse (P034)	OAC rule 3745-31-05(A)(3) PTI 03-14017	1.72 lbs/hr of particulate emissions (PE), 7.53 tons/yr  0.02 gr PE/dscf  Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	See A.I.2.a. The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3475-31-05 (A)(3).
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).

##### 2. Additional Terms and Conditions

- Best available technology (BAT) for this emissions unit has been determined to be use of a baghouse for the control of PE.
- All PE from this emissions unit shall be vented to the baghouse.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water\* while the emissions unit is in operation.

\*The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitations:  
1.72 lbs/hr PE, 7.53 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE by multiplying the maximum outlet PE concentration (0.02 gr/dscf) by the maximum exhaust flow rate (10,000 dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The tons/yr limitation was 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.

- 1.b Emission Limitation:  
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- 1.c Emission Limitation:  
0.02 grain PE/dscf

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** P036 (P036)  
**Activity Description:** South Megalac Process Reactor

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MEGALAC production - process reactor (wet end), equipped with a baghouse (P036)	OAC rule 3745-31-05(A)(3) PTI 03-13167	0.86 lb/hr of particulate emissions (PE), 3.77 tons PE/yr  0.02 gr PE/dscf  Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	See A.I.2.a. The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3475-31-05 (A)(3).
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).

**2. Additional Terms and Conditions**

- 2.a Best available technology (BAT) for this emissions unit has been determined to be use of a baghouse for the control of PE.
- 2.b All PE from this emissions unit shall be vented to the baghouse.

**II. Operational Restrictions**

1. The pressure drop across the process baghouse shall be maintained within the range of 2 to 8 inches of water\* while the emissions unit is in operation.

\* The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from 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 and location of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitations:  
0.86 lb/hr PE, 3.77 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE by multiplying the maximum outlet PE concentration (0.02 gr/dscf) by the maximum exhaust flow rate (5,000 dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The tons/yr limitation was 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.

- 1.b Emission Limitation:  
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- 1.c Emission Limitation:  
0.02 grain PE/dscf

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Facility Name: **Church & Dwight Co., Inc**

Facility ID: **03-74-00-0022**

Emissions Unit: **P036 (P036)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** P039 (P039)  
**Activity Description:** Cat Litter Manufacturing Line

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
cat litter manufacturing line - material receiving, handling, mixing, and packaging, equipped with a baghouse (P039)	OAC rule 3745-31-05(A)(3) PTI 03-13515	0.62 lb/hr of particulate emissions (PE), 2.72 tons PE/yr  0.01 gr PE/dscf  Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	See A.I.2.a. The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3475-31-05 (A)(3).
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be use of a baghouse for the control of PE.
- 2.b All PE from this emissions unit shall be vented to the baghouse.

##### II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 2 to 12 inches of water\* while the emissions unit is in operation.

\* The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from 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 and location of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.62 lb/hr PE, 2.72 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE by multiplying the maximum outlet PE concentration (0.01 gr/dscf) by the maximum exhaust flow rate (7,200 dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The tons/yr limitation was 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.

- 1.b Emission Limitation:  
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- 1.c Emission Limitation:  
0.01 grain PE/dscf

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Facility Name: **Church & Dwight Co., Inc**

Facility ID: **03-74-00-0022**

Emissions Unit: **P039 (P039)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** P901 (P901)

**Activity Description:** Classification, Conveying and Bagging with Baghouse (previously P005)

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
NaCO3 classification - conveyors, elevators, mills, screeners, bagger, supersackers, and bins, equipped with 3 baghouses (P901)	OAC rule 3745-31-05(A)(3) PTI 03-8045	7.54 lbs/hr of particulate emissions (PE), 33.0 tons PE/yr (from the stacks associated with the 3 baghouses)
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

**2. Additional Terms and Conditions**

- 2.a** This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Seneca County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c** The PE from the following pieces of equipment associated with this emissions unit shall be vented to the 3 baghouses: conveyors, elevators, mills, screeners, bagger, supersackers, and bins.

## II. Operational Restrictions

1. The pressure drop across each process baghouse shall be maintained within the range of 2 to 12 inches of water\* while the emissions unit is in operation.

\* The pressure drop restriction shall apply at all times, except during periods of rebagging and until sufficient filter cake is developed on the bags.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the baghouses did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitations:  
7.54 lbs/hr PE, 33.0 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE by multiplying the maximum outlet PE concentration (0.03 gr/dscf) by the maximum exhaust flow rate (29,337 dscfm) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The tons/yr limitation was 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.

- 1.b Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

1. The permittee failed to account for fugitive PE from this emissions unit in its application for PTI # 03-8045, dated April 20, 1994. Therefore, as the initial step for this emissions unit to account for fugitive PE and achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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