



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

Certified Article Number

9414 7266 9904 2170 0971 99

SENDER'S RECORD

April 13, 2021

Mr. Doug Dils
Plant Manager
Colgate-Palmolive Company
200 Centennial Court
Morristown, TN 37813

Re: Operating Without a Permit
Colgate-Palmolive Company
200 Centennial Court, Morristown
Facility ID: 32-0238-08

Dear Mr. Dils:

On November 30, 2020, the Technical Secretary issued construction permit 978408 for a weighing tote dump station. A start-up certification dated February 25, 2021, for the weighing tote dump station was received March 25, 2021, which indicated a start-up date of January 19, 2021. An operating permit application for the weighing tote dump station dated February 25, 2021, was received March 11, 2021.

Condition G15 of construction permit 978408 states, in pertinent part, "The completed startup certification in Appendix 1 shall be submitted to the Permitting Program at the address listed below or via email, no later than 30 days after the air contaminant source is started-up."

Condition G11 of construction permit 978408 states, in pertinent part, "The permittee shall apply for an operating permit within 30 days of initial startup of the emission source." Therefore, the start-up certification was due February 18, 2021, and the application for the operating permit was due February 18, 2021. Based on the startup certification and the receipt date of the operating permit application (March 25, 2021 and March 11, 2021, respectively), the startup certification was 35 days late and the operating permit application was 21 days late.

Condition G12A of permit 978408 states, "This permit shall serve as a temporary operating permit from the date of issuance to the receipt of a standard operating permit, provided that an operating permit application is filed in a timely manner as required by condition G11."

By failing to apply for an operating permit in accordance with condition G11 of construction permit 978408 the construction permit no longer serves as a temporary operating permit. Without the temporary operating permit provided by condition G12A of construction permit 978408, you have been operating without a permit.

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Therefore, you are in violation of the following Tennessee Air Pollution Control Regulations:

Division Rule 1200-03-09-.01(1)(d), states:

Construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants must be in accordance with the approved construction permit application, the provisions and stipulations set forth in the construction permit, all provisions of the regulations of this Division 1200-03, any applicable measures of the control strategy, and all provisions of the Tennessee Air Quality Act.

Division Rule 1200-03-09-.02(2), states:

No person shall operate an air contaminant source in Tennessee without first obtaining from the Technical Secretary an operating permit or, if applicable, submitting a notice of intent and obtaining a notice of coverage or authorization, except as specifically exempted in Rule 1200-03-09-.04.

Compliance with the Tennessee Air Quality Act, the Tennessee Code Annotated, and the Tennessee Air Pollution Control Regulations contribute to the protection of the health, welfare, and physical property of the people and are used to help maintain an equitable balance between the benefits of clean air and the economic cost of achieving clean air in our state.

If you have any information that proves the violations did not occur (i.e. late startup certification, failing to submit the operating permit application on time, operating without a permit), or if you have any additional information regarding this violation that you would like to submit, you may submit that information in writing to the Technical Secretary, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15TH Floor, Nashville, Tennessee 37243 or e-mail the response letter to Air.Pollution.Control@TN.gov. To ensure that your information will be considered, it must be submitted within 20 days of your receipt of this **Notice of Violation**.

Technical inquiries surrounding this allegation of noncompliance should be directed to Ms. Jill Pratt at (865) 594-5573 or at Jill.Pratt@tn.gov. Questions concerning the enforcement process should be directed to Air.Pollution.Control@TN.gov.

Sincerely,



James P. Johnston, P.E.
Deputy Director
Permitting and Regulatory Development