



April 22, 2021

Technical Secretary

15th Floor William R Snodgrass Tennessee Towers

312 Rosa L Parks Avenue

Nashville, TN 37243

Submitted:

1. via air.pollution.control@tn.gov
2. by certified mail (return receipt requested)

RE: Notice of Violation Dated April 13, 2021

Emission Source Reference Number: 32-0238-08

Dear Technical Secretary:

Colgate-Palmolive Company (Col-Pal) received a Notice of Violation (NOV) from the Tennessee Department of Environment and Conservation (TDEC) on April 15, 2021. This letter is being submitted in response to the NOV.

Upon receiving the NOV, an investigation was initiated to address the violations identified in the NOV. We quickly realized that the February 25, 2021 Startup Certification was submitted by mistake. The January 19, 2021 date noted in the previously submitted Startup Certification was the date that the dust collector was installed; it was not the source startup date, or even the construction completion date for that matter. As indicated in the corrected Operating Permit Application attached hereto, construction of the weighing tote dump station (Emission Source No. 32-0238-08), as per Construction Permit No. 978408, began in January 2021 and was completed on April 5, 2021. The associated process went through the final Operation Qualification on April 5, 2021 and, as indicated in the corrected Startup Certification attached hereto, initial startup of the new source was on April 18, 2021.

We are hereby withdrawing our previously submitted Startup Notification and Operating Permit Application. Please accept our corrected Startup Notification and Operating Permit Application (attached) with April 18, 2021 as the startup date.

Col- Pal respectfully requests that TDEC disregard the previous submission and withdraw the NOV.

We apologize for the error and any extra work this may have created on TDEC's part.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Dils'.

Douglas Dils

Plant Manager

cc: Jill Pratt, Tennessee Department of Environment and Conservation
Aron Yellott, Colgate- Palmolive Company
Chris Manis, Colgate Palmolive Company
Jeff Twaddle, ERM



**NON-TITLE V PERMIT APPLICATION
FACILITY IDENTIFICATION**

Type or print and submit. Attach appropriate source description forms.				
SITE INFORMATION				
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)] Colgate-Palmolive Company SOS Control Number: 000036828				
2. Site name (if different from legal name)				
3. Is a construction permit application fee being submitted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (see instructions for appropriate fee to submit)				
4. Site address (St./Rd./Hwy.) 200 Centennial Court			County name Hamblen	
City Morristown		Zip code 37813		5. NAICS or SIC code 325611
6. Site location (in lat. /long.)	Latitude 36 10' 39"		Longitude 83 22' 20"	
CONTACT INFORMATION (RESPONSIBLE PERSON)				
7. Responsible person/Authorized contact Doug Dils			Phone number with area code 423-522-3001	
Mailing address (St./Rd./Hwy.) 200 Centennial Court			Fax number with area code	
City Morristown	State TN	Zip code 37813	Email address douglas_dils@colpal.com	
CONTACT INFORMATION (TECHNICAL)				
8. Principal technical contact Chris Manis			Phone number with area code 423-522-3331	
Mailing address (St./Rd./Hwy.) 200 Centennial Court			Fax number with area code	
City Morristown	State TN	Zip code 37813	Email address christopher_manis@colpal.com	
CONTACT INFORMATION (BILLING)				
9. Billing contact Chris Manis			Phone number with area code 423-522-3331	
Mailing address (St./Rd./Hwy.) 200 Centennial Court			Fax number with area code	
City Morristown	State TN	Zip code 37813	Email address christopher_manis@colpal.com	

AIR CONTAMINANT SOURCE(S) INFORMATION**10. Description of air contaminant source(s) and Unique Source ID(s).** List, identify, and briefly describe

Emission Source Reference No. 32-0238-08: Weighing Tote Dump Station

Tote to pre-weigh charcoal for transfer to a mixing vessel/ tank used to blend charcoal with sorbitol. The tote holds approximately 900 lb of charcoal (sufficient for two batches of charcoal-sorbitol blend). Dust collector controls dust/ particulate matter from filling of tote. The dust collector (cartridge filter) is located external to the building which encloses the weighing tote dump station and mixing operation. The dust collector is rated at 3,000 acfm exhaust gas flow rate. Dust Collector Stack ID DS-1.

The tote is manually filled with charcoal (from bags). Approximately one-hour is required to fill the tote, and then the charcoal is vacuum pumped from the tote to the mixing vessel beneath the surface of the sorbitol liquid contained in the mixing vessel. The approximate charcoal-sorbitol blend batch time is 2.5 hours. The mixing vessel vent is uncontrolled. The mixing tank is considered an insignificant emission unit since only a negligible amount of volatile organic compounds (VOCs) is emitted from the mixing tank.

11. Is the air contaminant source(s) in a nonattainment area? If "Yes", then minor source BACT must be addressed. Yes No☐☒

12. Normal operation:	Hours/Day	Days/Week	Weeks/Year	Days/Year
13. Percent annual throughput	Dec. - Feb.	March - May	June - August	Sept. - Nov.

TYPE OF PERMIT REQUESTED (check appropriate box)

14. Operating permit <input checked="" type="checkbox"/>	Date construction started January 2021	Date completed 4/5/2021	Date of ownership change (if applicable)
	Last permit number(s) 978408		Emission Source Reference Number(s) 32-0238-08
Construction permit <input type="checkbox"/>	Last permit number(s)		Emission Source Reference Number(s) New - Not Assigned

If you chose Construction permit above, then choose either New Construction, Modification, or Location Transfer

New Construction <input type="checkbox"/>	Starting date	
Modification <input type="checkbox"/>	Date modification started or will start	Date completed or will complete
Location Transfer <input type="checkbox"/>	Transfer date	Address of last location

15. Describe changes that have been made to this equipment or operation(s) since the last construction or operating permit application:

New construction - Not applicable

16. Comments

SIGNATURE

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

17. Signature (application must be signed before it will be processed)

Date

Signer's name (type or print)

Title

Phone number with area code

Douglas Dils

Plant Manager

423-522-3001

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243



Permit to Construct or Modify an Air Contaminant Source Issued Pursuant to Tennessee Air Quality Act

Date Issued: November 30, 2020	Permit Number
Date Expires: November 29, 2022	978408
	Facility ID: 32-0238
Issued To: Colgate-Palmolive Company	Installation Address 200 Centennial Court Morristown
Installation Description	Emission Source Reference No.
08: Weighing Tote Dump Station	32-0238-08 True Minor Source

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).

General Conditions

- G1. The application that was utilized in the preparation of this permit is dated July 6, 2020, and is signed by Douglas Dils, Plant Manager for the permitted facility. If this person terminates their employment or is assigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

TAPCR 1200-03-09-.03(8)

(conditions continued on next page)


TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

G2. Visible and Fugitive Emissions

- A. Visible Emissions: Visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any 24 hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

- B. Fugitive Emissions: 1) No person shall cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
- (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
- (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

2) No person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR 1200-03-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

- C. Fugitive Emissions from Roads and Parking Areas: Visible emissions from roads and parking areas shall not exhibit greater than 10% opacity utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

TAPCR 1200-03-08-.03

G3. Facility-wide Limitations

[Reserved]

G4. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and to assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than two years. The date each maintenance and repair activity began shall be entered in the log no later than 30 days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than 30 days from activity completion.

G5. General Recordkeeping Requirements

A. The following recordkeeping requirements shall apply to this facility:

- 1) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 30 days from the end of the month for which the data is required.
- 2) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the week for which the data is required.
- 3) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the day for which the data is required.
- 4) All maintenance activities required by **Condition G4** (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than 30 days following the start of the maintenance.

B. Logs and records specified in this permit shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than two years unless otherwise noted. Logs and records contained in this permit are based on a recommended format. Any logs that have an alternative format may be utilized provided such logs contain the same or equivalent information that is required. Computer-generated logs are also acceptable.

TAPCR 1200-03-10-.02(2)(a)

G6. Other State and Federal Regulations

This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, all applicable provisions of the Tennessee Air Pollution Control Regulations, federal regulations published under 40 CFR 61 and 40 CFR 63 for sources of hazardous air pollutants, and federal regulations published under 40 CFR 60, New Source Performance Standards.

TAPCR 1200-03-09-.03(8)

G7. Startup, Shutdown, and Malfunction Requirements

A. The facility must take all reasonable measures to keep emissions to a minimum during source startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-20-.02(1)

B. **Monitoring Systems:** Due allowance for failure to monitor shall be made during any period of monitoring system malfunction, provided that the source owner or operator shows, to the satisfaction of the Technical Secretary, that the malfunction was unavoidable and is being repaired as expeditiously as practicable, and that a log of all such malfunctions is being kept by the owner or operator, including the time the malfunction began, when it was detected, what was wrong, what was done to correct the malfunction, and when the malfunction was corrected. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-10-.02(1)(e)

G8. Excursions

All excursions from indicated parameter limits or ranges shall be recorded in a permanent suitable format and retained at the source location for a period of not less than two years.

The record of excursions shall include, at a minimum, the time the excursion was discovered, the corrective action taken, and the time that the process was back within the normal operating range.

TAPCR 1200-03-10-.02(2)(a)

“Excursion” shall mean a departure from an indicator range established for monitoring, consistent with any averaging period specified for averaging the results of the monitoring.

G9. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition G1**, and any documented agreements made with the Technical Secretary (see Appendix 2).

TAPCR 1200-03-09-.01(1)(d) and 1200-03-09-.02(6)

G10. Permit Transference

A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location.

TAPCR 1200-03-09-.03(6)(b)

B. In the event an ownership change occurs at this facility, written notification of the ownership change requesting a permit amendment must be submitted to the Technical Secretary no later than 30 days after the change occurs. This notification must include an agreement to abide by the terms of the permit, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

TAPCR 1200-03-09-.03(6)(a)

G11. Operating Permit Application Submittal

The permittee shall apply for an operating permit within 30 days of initial start-up of the emission source. If construction of the source cannot be completed and an operating permit application cannot be filed with the Technical Secretary by the expiration date of this permit, a permit extension request must be submitted in writing at least 30 days prior to the permit expiration date unless a different time frame is approved by the Technical Secretary. The permit extension request and/ or operating permit application shall be submitted to the following address or via email.

Tennessee Dept. of Environment and
Conservation
Division of Air Pollution Control
Permitting Program
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

or Adobe Portable Document Format (PDF)
Copy to: Air.Pollution.Control@TN.gov

TAPCR 1200-03-09-.02(1) and 1200-03-09-.02(3)

G12. Temporary Operating Permit

- A. 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**.

TAPCR 1200-03-09-.02(2)

- B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating permit, all provisions of the Tennessee Division of Air Pollution Control Regulations, and all provisions of the Tennessee Air Quality Act.

TAPCR 1200-03-09-.02(6)

G13. Fees

This source shall comply with the requirements for payment of applicable annual emission fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule detailed in TAPCR 1200-03-26.

TAPCR 1200-03-26-.02

G14. Emission Statements

[Reserved]

G15. Startup Certification

The completed startup certification in Appendix 1 shall be submitted to the Permitting Program at the address listed below or via e-mail, no later than 30 days after the air contaminant source is started-up.

Tennessee Dept. of Environment and
Conservation
Division of Air Pollution Control
Permitting Program
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

or Adobe Portable Document Format (PDF)
Copy to: Air.Pollution.Control@TN.gov

TAPCR 1200-03-09-.02(3)(b)

Source Specific Conditions for Source 32-0238-08: Weighing Tote Dump Station: Tote to pre-weigh charcoal for transfer to a mixing vessel/ tank used to blend charcoal with sorbitol. The tote holds approximately 900 lb of charcoal (sufficient for two batches of charcoal-sorbitol blend). Dust collector controls dust/ particulate matter from filling of tote. The dust collector (cartridge filter) is located external to the building which encloses the weighing tote dump station and mixing operation. The dust collector is rated at 3,000 acfm exhaust gas flow rate. Dust Collector Stack ID DS-1.

The tote is manually filled with charcoal (from bags). Approximately one-hour is required to fill the tote, and then the charcoal is vacuum pumped from the tote to the mixing vessel beneath the surface of the sorbitol liquid contained in the mixing vessel. The approximate charcoal-sorbitol blend batch time is 2.5 hours. The mixing vessel vent is uncontrolled. The mixing tank is considered an insignificant emission unit since only a negligible amount of volatile organic compounds (VOCs) is emitted from the mixing tank.

S1-1. Input Limitation(s)

The stated nominal design input capacity of the weighing tote is 900 pounds per hour of charcoal. Should the permittee need to modify this operation in a manner that increases the design input capacity, a construction permit shall first be applied for in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-09-.03(8) and the permit application dated July 6, 2020 (see Appendix 2)

Compliance Method: The permittee has certified the design input capacity of the tote in the cover letter dated June 22, 2020 (see Appendix 2), contained in the permit application dated July 6, 2020

S1-2. [Reserved]

S1-3. [Reserved]

S1-4. Emission Limitations

Particulate matter (PM) emitted from this source shall not exceed a maximum of 2.19 pounds per hour on a daily average basis (9.59 tons per year).

TAPCR 1200-03-07-.03(1), and the application dated July 6, 2020

Compliance method: Compliance with this emission limitation is based on compliance with **Condition S1-1** and operation of the dust collector during material (charcoal) loading and unloading of the weighing tote dump station. The permittee shall monitor the pressure drop across the dust collector as follows:

- a) The permittee shall install a pressure gauge to measure the pressure drop (inches of water) across the dust collector. Upon startup of this source, the permittee shall compile 30 consecutive operating days of pressure drop readings across the dust collector. The designated person(s) shall note any relevant dust collector conditions/problems/concerns when recording the values.
- b) The pressure drop data, including a proposed minimum pressure drop value, shall be submitted to the Division no later than 15 days after completion of the readings. The data shall be submitted to the following Division site address or email address:

Permitting Program
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 15th Floor
 312 Rosa L. Parks Avenue
 Nashville, TN 37243

Or email the information in Adobe Portable Document
 Format (PDF) Copy to:
Air.Pollution.Control@tn.gov

- c) Upon review and approval of the test data by the Technical Secretary, the permittee shall maintain the approved minimum pressure drop across the dust collector. The operating permit for this source shall include the established minimum pressure drop value.
- d) The permittee shall record a minimum of one pressure drop reading per day in a log on days when the weighing tote dump station is in operation (charcoal loading and unloading). The log shall include the time of the reading, the value read, the name of the plant operator recording the value, and any relevant comments as needed. The permittee shall note all days when the source is not operating. This requirement is applicable upon startup of the source, regardless of whether a minimum pressure drop has been established.
- e) If the pressure drop reading falls below the minimum value, the operator shall inspect the dust collector and initiate corrective actions to bring the pressure drop to above the minimum value.
- f) The operator shall note all inspection findings and corrective actions in the log. For lower pressure drop reading(s) resulting from replacement of cartridge filters, the permittee shall record the deviation(s) as such in their daily records. Due allowance will be made for lower pressure drop reading(s) which follow replacement of cartridge filters, provided the permittee establishes to the satisfaction of the Technical Secretary that these lower readings resulted from filter replacement.
- g) This log shall be recorded in a suitable permanent form and kept available for inspection by an authorized Division representative. An example log is provided below. These records must be retained for a period of not less than two years. Recordkeeping shall be conducted in accordance with **Condition G5**.

Source 32-0238-08 Daily Log: Dust Collector Pressure Drop Readings

Date: Month/ day/ year	Time of reading and operator initials	Dust Collector pressure drop reading (inches of water)	Comments

- h) Records of maintenance inspections and repairs shall be maintained in accordance with **Condition G4** for the dust collector.
- i) Operation of the dust collector is only required during operation of the weighing tote dump station. Dust collector operation is not required during production of charcoal-sorbitol blend product in the mixing tank. Operation of the tote dump station includes charcoal loading to the tote and material transfer/ unloading of the tote to the mixing tank.

S1-5. [Reserved]

S1-6. [Reserved]

Appendix 1: Startup Certification

Start Up Certification for Colgate-Palmolive Company Weighing Tote Dump Station

Start Up Certification for Source 32 - 0238 - 08

The permittee shall certify the initial start-up date(s) of the new or modified air contaminant source(s) regulated by this permit by submitting

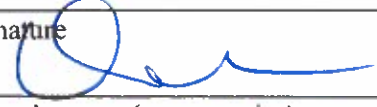
A COPY OF THE FRONT PAGE OF THIS PERMIT,
with the information required in A) and B) of this certification completed, to the Technical Secretary's representatives listed below:

A) DATE OF INITIAL START-UP: 4 / 18 / 2021
month day year

B) Anticipated operating rate: 100 percent of maximum rated capacity

For the purpose of complying with this condition, "initial start-up" of the air contaminant source shall be the date the new or modified source began operation for the production of product for sale, use as raw materials, or steam or heat production under the terms of this permit.

The undersigned affirms that this person has the full authority to represent and bind the permittee in environmental permitting affairs. The undersigned further affirms that the above provided information is true to the best of his/her knowledge and belief.

Signature 		Date <u>4/22/2021</u>
Signer's name (type or print) Douglas Dils	Title Plant Manager	Phone (with area code) 423-522-3001

Note: This certification is not an application for an operating permit. At a minimum, the appropriate application form, usually an APC-100, must be submitted requesting an operating permit. The application must be submitted in accordance with the requirements of this permit.

The completed certification shall be submitted to the Permitting Program at the address listed below or via e-mail, no later than 30 days after the air contaminant source is started-up.

TN Dept. of Environment and Conservation
Attn: Permitting Program
Division of Air Pollution Control
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

or

Adobe Portable Document Format (PDF)
Copy to: Air.Pollution.Control@TN.gov

TAPCR 1200-03-09-.02(3)(b)

(end of conditions)

The permit application gives the location of this source as 36°10'39" Latitude and -83°22'20" Longitude.

Appendix 2

Agreement letter dated June 22, 2020 and Application APC 102 form dated July 6, 2020

June 22, 2020

Technical Secretary
Tennessee Division of Air Pollution Control
15th Floor, William R Snodgrass Tennessee Tower
312 Rosa L Parks Avenue
15th Floor, Nashville, TN 37243

Subject: Application for Minor Source Construction Permit
Addition of Dump Station Weight Tote
Emission Source Reference Number 32-0238

Ms. Technical Secretary:

The Colgate-Palmolive Company (CoPal) emission sources are covered by operating permits and permit-by-rule permits at its facility in Morristown in Hamblen County. Hamblen County is an unclassified or an attainment area for the National Ambient Air Quality Standard pollutants.

PROJECT

CoPal intends to construct a tote used to pre-weigh charcoal into a mixing vessel to blend the charcoal with sorbitol. The tote will be equipped with a dust collector to control dust that occurs from filling the tote with raw material.

PROJECT DESCRIPTION

A Mix Vessel will be installed to produce a charcoal-sorbitol solution blend. The sorbitol solution will be piped into the vessel through a dedicated port. The charcoal will be piped into the Mix Vessel through another port below the sorbitol liquid level. The Mix Vessel will have to be completely enclosed to allow the vacuum pump to operate. Negligible emissions of Volatile Organic Compounds (VOC) will occur due to evaporation of sorbitol. Though negligible, these emissions are quantified in the attachments. A process flow diagram appears in Attachment A. More technical detail is provided in the permit application forms in Attachment B. Supporting emission calculations appear in Attachment C.

The charcoal is pre-weighed in a tote at the dump station from where the charcoal is charged into the Mix Vessel. The tote cannot hold more than two batches of charcoal charge (at 450 pounds per charge). Assuming the tote is filled, it will process two charges in the mix Vessel at a minimum batch time of 2.5 hours. This means that 900 pounds of charge will be used over a period of 5 hours. Therefore 1 hour of Weighing Tote loading can potentially be conducted over a 5-hour period. This means that if the Weighing Tote is loaded to maximum capacity, the maximum loading operating schedule potential for the Weighing Tote is 1,752 hour per year.

The tote will be manually loaded from bags of charcoal that will lay on top of the tote opening and allowed to pour into the interior of the tote. An overlaying hood will capture the dust from filling the tote and vent into a 3000 cfm dust collector located at the exterior of the building.

APPLICABLE REQUIREMENTS

The facility is a true minor source of emissions. Since this project only releases particulate matter with a negligible quantity of VOC, this section will focus on particulate matter only. Table 1 gives a tally of the potential to emit particulate matter which includes the future operation of the weighing tote.

Table 1. Facility-Wide Emissions

Emission Source Reference Number	Source Description	Particulate Matter (ton/yr)
32-0238-01	Insignificant Activity, Silica Silo	0.18
32-0238-02	Two 700 hp Boilers at 28.6 MMBtu/hr, Each	60.01
32-0238-03	Insignificant Activity, Zeodent Silo	0.18
32-0238-04	Storage Silo	5.65
32-0238-05	4.03 MMBtu/hr Diesel-Fired Emergency Power Generator	10.60
32-0238-06	275 hp (205 kw) Internal Combustion Fire Pump Engine After April 2006 Model	0.02
32-0238-07	355 hp (261 Kw) Internal Combustion Fire Pump Engine after April 2006 Model	0.03
Project	Dump Station Weighing Tote	2.10
32-0238	Facility-Wide	78.77

Federal National Emission Standards for Hazardous Air Pollutants

Since this site is qualified as a True Minor source, a determination has been made that it is a Hazardous Air Pollutant (HAP) area source of emissions too. No HAP is released from this project; so, this project is not subject to 40 CFR 61 or 63 National Emission Standards of Hazardous Air Pollutants.

Federal New Source Performance Standards

The Federal Standard of Performance for Coal Preparation and Processing Plants of 40 CFR 60 Subpart Y was evaluated for applicability to this project. It was found that this project is not subject to this standard because charcoal is not coal. The definitions in this standard in 40 CFR §60.251(d) state that coal is a fossil fuel. Though fossil fuel is not directly defined in 40 CFR 60 Subpart Y, it is defined in 40 CFR §60.41 to be natural gas, petroleum, coal, and any form of solid, liquid, or gaseous fuel derived from such materials. Fossil is not defined in the rules; however, it is a "remnant, impression, or trace of an organism of past geologic ages that has been preserved in the earth's crust."¹ Charcoal is made from a remnant organism, timber; however it has not been preserved in earth's crust over a period of time.

The Federal Standard of Performance for Non-Metallic Mineral Processing of 40 CFR 60 Subpart OOO was evaluated for applicability to this project. It was found that this project is not subject to this standard because filling a tote is not among the operations regulated by this standard provided in 40 CFR §60.670(a) and the minerals regulated by this standard do not include charcoal or graphite as provided in 40 CFR §60.671 in the definition of a mineral. No crushing

¹ <https://www.merriam-webster.com/dictionary/fossil>

activities occur at this source.

No other New Source Performance Standards were found to potentially apply to this project.

Tennessee State Standards

Tennessee Air Pollution Control Regulations were evaluated and the general and source category standards were evaluated for applicability. The following were identified as applicable.

TAPCR 1200-3-5:

The visible emissions standard of TAPCR 1200-3-5-.01(1) and -.3(6) allow the Dump Station dust collector stack to release an opacity of no more than twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period.

TAPCR 1200-3-7:

TAPCR 1200-3-7-.03(1) which has a maximum allowable emission rate calculated by the formula:

$$E = 4.10 \times P^{0.67}$$

where,

E is the rate of emission and calculated to be 2.40 pounds per hour and P is the process weight rate of 900 pounds per hour and used as 0.45 tons per year in the formula.

TAPCR 1200-3-26:

Construction Permit Filing fees of TAPCR 1200-3-26-.02(5)(a) are made with this permit application. According to Schedule A of the this Chapter, a permit application requesting an emission limit with a Maximum Allowable that is less than 10 tons per year will have to submit a check payable to the "Division of Air Pollution Control" in the amount of \$100 US. The Maximum Allowable Emissions for this project are listed under "Project" to be 2.10 tons per year.

Other TAPCR Standards and Rules

The following are generally applicable while the other requirements are not applicable:

- TAPCR 1200-3-1 (General Provisions)
- TAPCR 1200-3-2 (Definitions)
- TAPCR 1200-3-3 (Ambient Air Quality Standards)
- TAPCR 1200-3-4 (Open Burning Certification Process)
- TAPCR 1200-3-8 (Fugitive Dust)
- TAPCR 1200-3-9 (Construction and Operating Permits)
- TAPCR 1200-3-10 (Required Sampling and Recordkeeping)
- TAPCR 1200-3-13 (Violations)
- TAPCR 1200-3-15 (Emergency Episode Plan)
- TAPCR 1200-3-20 (Limits of Emission due to Malfunction, Startup and Shutdown)
- TAPCR 1200-3-26 (Annual Fees)

SUMMARY

CoPal's consultant, Environmental Resources Management (ERM) assisted in preparing the technical aspects of this permit application. In summary, CoPal is proposing to install a Weighing tote equipped with a dust collector. The facility is a True minor source of emissions. The addition of this unit maintains the True Minor status.

The Mix Vessel that is serviced by the weighing tote can be classified as an insignificant activity because its VOC emissions are negligible as provided in the form supporting emission calculations.

If you have any questions regarding this application, please contact Mr. Chris Manis, EOHS Focus Resource at (423) 522-3331.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Dils', with a long horizontal flourish extending to the right.

Doug Dils
Plan Manager

Attachment

cc: Chris Manis, EOHS Focus Resource - Colgate -Palmolive Company
Jeffrey H. Twaddle, P.E. - Environmental Resources Management



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF AIR POLLUTION CONTROL
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
 Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 102

**NON-TITLE V PERMIT APPLICATION
 PROCESS OR FUEL BURNING SOURCE DESCRIPTION**

Type or print. Submit with the APC 100.			
GENERAL IDENTIFICATION AND DESCRIPTION			
1. Organization's legal name and SOS control number (as registered with the TN Secretary of State (SOS)) Colgate-Palmolive Company SOS Control Number: 000036828		2. Emission Source Reference Number Not Assigned	
3. Is this air contaminant source subject to an NSPS or NESHAP rule? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, list rule citation, including Part, Subpart, and applicable Sections:			
4. Unique Source ID (see instructions)		5. Unique Emission Point ID (see instructions) DS-1	
6. Description of air contaminant source Mix Tank with Weighing Tote Dump Station			
7. Type of air contaminant source (Check only one option to the right)			
Process Emission Source: For each process emission source, submit a separate application (Check at right and complete lines 8, 9, and 14)			<input checked="" type="checkbox"/>
Process Emission Source with in process fuel: Products of combustion contact materials heated. For each process emission source, submit a separate application. (Check at right and complete lines 8 through 14)			<input type="checkbox"/>
Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 10 through 14)			<input type="checkbox"/>
PROCESS EMISSION SOURCE DESCRIPTION AND DATA			
8. Type of operation: Continuous <input type="checkbox"/> Batch <input checked="" type="checkbox"/>		Normal batch time 1 hr	Normal batches/day Not determined
9. Process material inputs and in-process solid fuels		Input rates (pounds/hour)	
Diagram reference		Design	Actual
A. Charcoal	DS-1	900	
B.			
C.			
D.			
E.			
F.			
G.			
Totals		900	

* A simple process flow diagram must be attached.

APC 102

14. Comments

The Dump Station is the source of emissions. The Mix Vessel downstream is a negligible source of VOC emissions.

SIGNATURE

If this form is being submitted at the same time as an APC 100 form, then a signature is not required on this form. Date this form regardless of whether a signature is provided. If this form is NOT being submitted at the same time as an APC 100 form, then a signature is required.

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

15. Signature**Date**

7-6-2020

Signer's name (type or print)**Title****Phone number with area code**

Doug Dils

Plant Manager

423-522-3001