



200 Centennial Court  
Morristown, TN 37814

## COLGATE PALMOLIVE COMPANY

June 14, 2019

Michelle W. Owenby  
Division Director  
State of Tennessee Department of Environment & Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
Nashville, TN 37243

18 JUN 2019 PM 11:22  
APC RCVD

Subject: Notice of Intent (NOI) for Division of Air Pollution Control Permit-by-Rule (PBR)  
for Emergency Fire Pump Engines  
Colgate-Palmolive Company – Morristown, TN, Facility ID: 32-0238

Dear Ms. Owenby:

Pursuant to TDEC's Policy Encouraging Self-Policing and Voluntary Correction, Colgate-Palmolive Company (Colgate) wanted to alert the agency to a minor issue related to a Notice of Intent to operate under the Permit-by-Rule Program for two fire pump engines at our Morristown, TN facility. Below is the background on this matter.

On December 7, 2017, Colgate submitted a Non-Title V Permit Application and a Permit-by-Rule Transition Program Qualification form for two fire pump engines at the Morristown facility. Because the letter included the statement, "Colgate-Palmolive is submitting a request for these two fire pump engines to be covered under the Permit-by-Rule Transition Program," the Company intended the letter to serve as a Notice of Intent for either a permit renewal or the Permit-by-Rule, whichever Air Pollution Control deemed applicable. Attached hereto is a copy of the December 7, 2017 letter.

Colgate received a notification letter from TDEC dated December 15, 2017 determining that the above mentioned fire pump engines qualify for the Air Pollution Control's Permit-by-Rule Transition Program. Attached hereto is a copy of the December 15, 2017 letter. Accordingly, the Company concluded that satisfied the air permit requirements.

Pursuant to the Company's EOHS compliance program, the Morristown site recently conducted a due diligence assessment to ensure full compliance with all air permit requirements. This assessment, performed by a third party vendor, was an objective, documented, systematic practice reflecting Colgate's due diligence in preventing, detecting, and correcting any violations. This assessment (as well as the voluntary disclosure set forth in this letter) was independent of any government investigation and/or litigation. The compliance assessment determined that the



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Company did not meet the requirement of the Notice-of-Intent for the Permit-by-Rule, by failing to notify the Agency of such intent upon receipt of the December 15, 2017 correspondence. In other words, the compliance assessment disputed that the December 7, 2017 letter was an adequate Notice of Intent. Therefore, the Company respectfully submits a Permit-by-Rule Notice of Intent Form CN-1514 at this time for existing fire pump engines (No. 971193P and No. 971208P) issued by the Tennessee Air Pollution Control Division (TNAPC) on November 7, 2016. The Company submits this Notice of Intent within sixty days of discovery of the alleged violation.

Please contact David Mooneyham, EOHS Manager, at (423) 522-3304 with any questions related to this request.

Regards,

Daniel Braidatto  
Director of Manufacturing  
Colgate Palmolive Company

Enclosure: Notice of Intent (NOI) for Division of Air Pollution Control Permit-By-Rule (PBR)  
Form CN-1514



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

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**NOTICE OF INTENT (NOI) FOR DIVISION OF AIR POLLUTION  
CONTROL PERMIT-BY-RULE (PBR)**

FACILITY INFORMATION			
Organization's legal name <b>Colgate-Palmolive Company</b>			
Facility name (if different from legal name) <b>same</b>			
Site address (St./Rd./Hwy.) <b>200 Centennial Court</b>		County name <b>Hamblen</b>	
City <b>Morristown</b>		Zip code <b>37813</b>	
CONTACT INFORMATION (RESPONSIBLE PERSON)			
Responsible person/Authorized contact <b>Daniel Braidatto, Director of Manufacturing</b>		Phone number with area code <b>423-522-3001</b>	
Mailing address (St./Rd./Hwy.) <b>200 Centennial Court</b>		Fax number with area code	
City <b>Morristown</b>	State <b>TN</b>	Zip code <b>37813</b>	Email address <b>daniel_braidatto@colpal.com</b>
CONTACT INFORMATION (TECHNICAL)			
Principal technical contact <b>David Mooneyham, EOHS Manager</b>		Phone number with area code <b>423-522-3304</b>	
Mailing address (St./Rd./Hwy.) <b>200 Centennial Court</b>		Fax number with area code	
City <b>Morristown</b>	State <b>TN</b>	Zip code <b>37813</b>	Email address <b>david_mooneyham@colpal.com</b>
TYPE OF NOTIFICATION OF AUTHORIZATION (NOA) REQUESTED			
<input type="checkbox"/> New Construction	<input type="checkbox"/> Existing Source w/o Permit	<input checked="" type="checkbox"/> Replace Existing Permit with PBR	<input type="checkbox"/> Change of Ownership
Construction Starting Date: <b>8-26-06 (Emission source 06) &amp; 9-19-06 (Emission source 07)</b>		Emission Source Reference Number: <b>32-0238-06 &amp; 32-0238-07</b>	
Construction Completion Date: <b>same</b>		Existing Permit Number: <b>971193P &amp; 971208P</b>	
Describe changes and/or modifications that have been made, since the last permit application or NOI: <b>None</b>			

PERMIT-BY-RULE CATEGORY			
For which PBR category is an NOA being requested? Potentially eligible categories are listed at Tenn. Comp. R. & Regs. 1200-03-09-.07(5).			
Gasoline Dispensing Facility	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	If Auto Body refinishing facility is not subject to 40 CFR 63 Subpart HHHHHH Miscellaneous Surface Coating and Paint Stripping rule (6H rule), complete <u>Opt-Out petition</u> instead of this form
Auto body refinishing subject to 6H	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Stationary emergency engine	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
CERTIFICATION OF ELIGIBILITY			
The facility at which this source is located <b>does not</b> have the potential to emit 100 tons per year or greater of any air pollutant subject to regulation and has not taken limits to reduce its potential to emit below this threshold.		Agree <input checked="" type="checkbox"/>	Disagree <input type="checkbox"/>
The facility at which this source is located <b>does not</b> have the potential to emit ten (10) tons per year or more of a single hazardous air pollutant or twenty-five (25) tons per year or more of any combination of hazardous air pollutants and has not taken limits to reduce its potential to emit below these thresholds.		Agree <input checked="" type="checkbox"/>	Disagree <input type="checkbox"/>
The facility <b>is/is not</b> located in a county designated serious, severe, or extreme <u>non-attainment</u> for ozone.		Is <input type="checkbox"/>	Is Not <input checked="" type="checkbox"/>
If the facility at which this source is located is in a county designated serious, severe, or extreme <u>non-attainment</u> for ozone, this source <b>does not</b> have the potential to emit ten (10) tons per year or more of nitrogen oxides or volatile organic compounds.		Agree <input checked="" type="checkbox"/>	Disagree <input type="checkbox"/>
SOURCE-SPECIFIC INFORMATION			
Gasoline Dispensing Facilities	Maximum monthly throughput in gallons		
List Pollution Control Devices (equipment such as submerged fill or Stage I vapor controls. If equipment details are known, list them. If not, list if submerged fill or Stage I vapor controls are present)			
Auto Body Refinishing (If facility is not subject to 6H, complete <u>Opt-Out petition</u> instead of this form)	Methylene chloride used?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
List Pollution Control Devices (include paint booths, HVLP, and similar pollution control devices)			

**Emergency Stationary Engine(s)** – Please complete the following information for all emergency stationary engines. If additional room is needed, please attach a separate page with the remaining engines and required information.

Number of Engines	Brief Description of Engine Purpose	Operated only during emergencies <sup>1</sup>	Engine Manufacture Date(s) (approximate) <sup>2</sup>	Engine Capacity in Horsepower <sup>3</sup>	Engine Fuel Type(s)	List Pollution Control Devices (such as low NOX burner)
1	Emergency fire pump	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Cummins Model CFP6E-F25. Mfg after April 1, 2006	Rated at 275 HP	Diesel	
1	Emergency fire pump	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	John Deere Model 60481HF001. Mfg after April 1, 2006	Rated at 355 HP	Diesel	
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				

<sup>1</sup> A maximum of 100 hours of non-emergency operation per calendar year as allowed within the provisions of the rule.

<sup>2</sup> If an engine is known to be manufactured prior to April 2005, you may indicate 'manufactured prior to April 2005' without having to approximate the manufactured date.

<sup>3</sup> If the engine serves a generator, be sure to list the engine power output, not the generator electrical output.

### 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 and any attached application(s) 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.

**Responsible person signature** (application must be signed before it will be processed)

**Date**

June 13, 2019

**Responsible person printed name**

Daniel Braidatto

**Title**

Director of Manufacturing

**Phone number with area code**

423-522-3001

Colgate-Palmolive  
200 Centennial  
Morristown, TN 37813

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Attn: Michelle W Owenby  
Division Director  
State of Tenn Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Spodgrass Tennessee Tower  
312 Rosa L Sparks Avenue, 15<sup>th</sup> Floor  
Nashville, TN 37243