



**State of Mississippi**



**FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT**

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

**THIS CERTIFIES**  
Reckitt Benckiser Inc  
815 North College Street  
Brandon, MS  
Rankin County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**Mississippi Environmental Quality Permit Board**

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**Mississippi Department of Environmental Quality**

Issued/Modified: MAY 23 2013

Expires: APR 30 2018

Permit No. 2380-00098

Agency Interest # 12708

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## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Reckitt Benckiser Inc  
 Subject Item Inventory  
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 Activity ID No.: PER20120001

### Subject Item Inventory:

ID	Designation	Description
AI12708	12708	Manufacturing of household rodenticides, detergent tablets and powder, septic system treatment and dishwashing rinse agent.
AREA1	AA-400	RID-X Process (Reference No. D-1) with baghouse
CONT1	AA-902	Finish Detergent Manufacturing Process Fugitive Dust Collection System equipped with a Baghouse
CONT2	AA-931	Finish Detergent Process Dust Collection System equipped with a baghouse
CONT3	AA-932	Finish Detergent Process Dust Collection System equipped with a baghouse
CONT4	AA-933	Finish Detergent Process Reclaim System equipped with a baghouse
CONT5	AA-934	Finish Detergent Process Dust Collection System equipped with a baghouse
CONT6	AA-936	Red Balls Manufacturing Process Cognac Batching Mixer Bin Vent Filter Baghouse
CONT7	AA-935	Red Balls Manufacturing Process Cognac Batching Vacuum Filter Receiver Baghouse
CONT8	AA-937	Red Balls Manufacturing Process Cognac Batching Bag Dump Station Baghouse
EQPT8	AA-501	2.10 MMBtu/Hr Natural gas-fired Boiler (Reference No. F-1)
EQPT9	AA-502	d-CON Material Truck Unloading Hopper
EQPT10	AA-503	d-CON Process - two (2) Material Hopper Silos equipped with a baghouse (Reference No. F-3)
EQPT11	AA-504(a)	d-CON Material Feeder and Finished Product Area -- Two Dense Phase Conveying Vessels equipped with a single baghouse
EQPT12	AA-504(b)	d-CON Material Feeder and Finished Product Area -- Work Bin
EQPT13	AA-504(c)	d-CON Material Feeder and Finished Product Area -- Finished Product Silos
EQPT14	AA-504(d)	d-CON Material Feeder and Finished Product Area -- Four (4) Final Work Bins
EQPT15	AA-504(e)	d-CON Material Feeder and Finished Product Area -- Four (4) Packaging Bins
EQPT16	AA-504(f)	d-CON Material Feeder and Finished Product Area -- Four (4) Packaging Filters
EQPT17	AA-504(g)	d-CON Material Feeder and Finished Product Area -- Two (2) Wheat Work Bins
EQPT18	AA-504(h)	d-CON Material Feeder and Finished Product Area -- Two (2) Formula Mixers
EQPT19	AA-505	d-CON Process Work Bin Pellet Mill, Cooler, and Crumbler (Reference No. F-5) equipped with a Baghouse

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ID	Designation	Description
EQPT20	AA-506	d-CON Process Material Line Receiver and Surge Hopper equipped with a Baghouse
EQPT21	AA-507	d-CON Process Material Work Bin equipped with a Baghouse
EQPT23	AA-509	d-CON Process Blending Product Work Bin equipped with a Baghouse
EQPT24	AA-510	d-CON Process VAC-U-MAX Bag Dump Station equipped with a Baghouse
EQPT25	AA-511	d-CON Process Material Byproducts Dump Station (Reference No. F-12) equipped with a Baghouse
EQPT26	AA-512	d-CON Process Surge Hopper equipped with a Baghouse
EQPT27	AA-513	d-CON Process Surge Hopper equipped with a Baghouse
EQPT28	AA-514	d-CON Process Surge Hopper equipped with a Baghouse
EQPT29	AA-515	d-CON Process Surge Hopper equipped with a Baghouse
EQPT30	AA-516(a)	d-CON Minor Ingredients VAC-U-MAX -- Rework Receiver equipped with a Baghouse
EQPT31	AA-516(b)	d-CON Minor Ingredients VAC-U-MAX -- Minor Ingredient Work Bin equipped with a Baghouse
EQPT32	AA-517(a)	Three (3) Finished Products Silo Receivers equipped with a Baghouse
EQPT33	AA-517(b)	d-CON Process Dye Filter Receiver equipped with a Baghouse
EQPT34	AA-518	d-CON Pellet Mill Waste Container equipped with a Baghouse
EQPT35	AA-519	Packaging Screener Fines Collection System equipped with a Baghouse
EQPT36	AA-520	Packaging Screener Fines Collection System equipped with a Baghouse
EQPT37	AA-521	Packaging Screener Fines Collection System equipped with a Baghouse
EQPT39	AA-523	Dye Feeder Screw Conveyor equipped with a Baghouse
EQPT40	AA-524	Dye Feeder Screw Conveyor equipped with a Baghouse
EQPT41	AA-522	Packaging Screener Fines Collection System equipped with a Baghouse
EQPT45	AA-804	Jet Dry Process (Ref. No. JD-1)
EQPT46	AA-901	Finish Detergent Manufacturing Process Railcar Unloading Receiver equipped with a Baghouse
EQPT48	AA-903	Finish Detergent Manufacturing Process Sodium Carbonate Silo equipped with a Baghouse

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ID	Designation	Description
EQPT49	AA-904	Finish Detergent Manufacturing Process Sodium Carbonate Silo equipped with a Baghouse
EQPT50	AA-905	Finish Detergent Manufacturing Process Sodium Tripolyphosphate Silo equipped with a Baghouse
EQPT51	AA-906	Finish Detergent Manufacturing Process Sodium Tripolyphosphate Silo equipped with a Baghouse
EQPT52	AA-907	Finish Detergent Manufacturing Process Sodium Sulfate Silo equipped with a Baghouse
EQPT53	AA-909	Finish Powder Plant Citric Acid Filter Receiver equipped with a Baghouse
EQPT54	AA-910	Finish Powder Plant 3 MMBtu/Hr Natural gas-fired Fluid Bed Dryer & Cooler equipped with a Baghouse
EQPT55	AA-911	Finish Powder Plant Packaging Rework Filter Receiver equipped with a Baghouse
EQPT56	AA-912	Finish Powder Plant Sodium Percarbonate Filter Receiver (Ref. No. 13-18) equipped with a Baghouse
EQPT57	AA-912(a)	Finish Powder Plant Properaze Filter Receiver (Ref. No. 13-18) equipped with a Baghouse
EQPT58	AA-913	Finish Powder Plant Sodium Percarbonate Filter Receiver equipped with a Baghouse
EQPT59	AA-928	Combined emissions from sodium sulfate filter receiver, sodium carbonate filter receiver, rework fines filter receiver, and filter receiver equipped with a baghouse
EQPT60	AA-929	Combined emissions from 6th floor minor ingredients blower, colored minors receiver, and minors receiver (all in tabs plant) equipped with a baghouse
EQPT61	AA-930	Liquid Carbon Dioxide System Baghouse
EQPT62	AA-914	Finish Detergent Process Indoor Sources - Electrasol Tab Plant Minor Ingredient Bag Dump Station (Ref. No. DP-1)
EQPT64	AA-919	Sodium bicarbonate receiver on 6th floor of Finish Plant equipped with a baghouse
EQPT65	AA-920	Soda Ash receiver on 6th Floor of Finish tab plant equipped with a baghouse
EQPT66	AA-916	Spencer Dust Collector - 4th Floor Finish equipped with a baghouse
EQPT67	AA-927	Finished product and rework material dust collector in Finish Powder equipped with a baghouse

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### KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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### AI0000012708 (12708) Manufacturing of household rodenticides, detergent tablets and powder, septic system treatment and dishwashing rinse agent.:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		Facility-Wide Emission Limitations The permittee shall limit particulate matter (PM/PM10/PM2.5) emissions to no more than 99.9 tons/year (TPY) as determined for each consecutive 12-month period. [APC-S-2 II.B(10)]
L-2		The permittee shall not cause, permit, or allow emissions from any point source to exceed 40% Opacity as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.2]
L-3		The permittee shall operate the baghouses at all times when particulate matter emissions may be vented. If a baghouse is inoperable or out of service, the permittee shall cease operations of the related process unit. [APC-S-2 II.B(10)]
L-4		For Emission Points AA-503, AA-504(a), AA-505, AA-506, AA-507, AA-509, AA-510, AA-511, AA-512, AA-513, AA-514, AA-515, AA-516, AA-516(a), AA-516(b), AA-517(a), AA-517(b), AA-518, AA-519, AA-521, AA-522, AA-523, AA-524, AA-901, AA-903, AA-904, AA-905, AA-906, AA-907, AA-909, AA-910, AA-911, AA-912, AA-912(a), AA-913, AA-914, AA-916, AA-919, AA-920, AA-927, AA-928, AA-929, AA-930, AA-931, AA-932, AA-933, AA-934, AA-935, AA-936, AA-937, and AA-938, the permittee shall maintain a pressure-drop within the manufacturer's recommended pressure drop range, or other range determined to indicate proper operation of the baghouse. [APC-S-2 II.B(10)]

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#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Points AA-400, AA-502, AA-503, AA-505, AA-506, AA-507, AA-509, AA-511, AA-515, AA-516, AA-517, AA-901, AA-902, AA-903, AA-904, AA-905, AA-906, AA-907, AA-909, AA-910, AA-911, AA-912, AA-913, AA-916, AA-928, AA-929, and AA-930, the permittee shall conduct visible emissions test according to EPA Reference Test Method 22 of 40 CFR 60, Appendix A, on a weekly basis and whenever there is a public complaint of visible emissions.</p> <p>For Emission Points AA-504(a) through 504(h), the permittee shall conduct a visible emissions test according to EPA Reference Method 22, 40 CFR 60, Appendix A, on a daily basis.</p> <p>Testing should be done during daylight hours and during conditions representative of normal operations. Observations shall be recorded for at least three (3) 6-minute periods. If any visible emissions (not including condensed water vapor) are observed, the permittee shall report the visible emissions as a potential deviation and the permittee shall:</p> <ol style="list-style-type: none"><li>(1) Within one hour, initiate corrective action to eliminate the visible emissions. Verify the air emissions equipment and any associated pollution control equipment is operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past.</li><li>(2) Within 24 hours of the end of the Method 22 Test in which visible emissions were observed and at least once per day until there is no indication of visible emissions, a certified visual emissions observer shall conduct an opacity test of each stack from which visible emissions were observed in accordance with EPA Reference Test Method 9, 40 CFR 60, Appendix A. [APC-S-2 II.B(11)]</li></ol>
M-2		<p>For Each Manufacturing Process (Red Balls, Rid-X, D-Con, Jet Dry, Finish Powder, and Finish Tablet), the permittee shall monitor the following:</p> <ol style="list-style-type: none"><li>(1) Feed Input. Process rate in tons/year of material fed to the operation for each consecutive (or rolling) 12-month period.</li><li>(2) The hours of operation for each consecutive (or rolling) 12-month period. [APC-S-2 II.B(11)]</li></ol>

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**AI0000012708 (continued):**

### Monitoring Requirements:

Condition No.	Parameter	Condition
M-3		<p>For each emission point for which a baghouse is the primary control device, the permittee shall:</p> <ol style="list-style-type: none"><li>(1) Install, calibrate, maintain and operate monitoring devices that continuously measure the pressure drop across the control device. Each measurement device must be recalibrated and checked annually and at other times the Mississippi Department of Environmental Quality (MDEQ) personnel may require, in accordance with the manufacturer's instruction.</li><li>(2) Perform regular inspections and required maintenance each calendar quarter or more often if necessary to maintain proper operation of the pollution control equipment.</li><li>(3) Maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operations of the related process unit until such time as repairs are made and the proper efficiency of the pollution control equipment is restored.</li><li>(4) Inspect and undertake corrective measures to restore baghouse operations to within the recommended operating range. [APC-S-2 II.B(11)]</li></ol>
M-4		<p>For Emission Points AA-504(a) through AA-504(h), the permittee shall install and maintain a "Burst Bag Detector" to continuously monitor operation of the baghouse for holes/leaks. [APC-S-2 II.B(11)]</p>

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#### Record-Keeping Requirements:

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Condition No.	Condition
R-1	<p>Recordkeeping Requirements</p> <p>For Emission Points AA-400, AA-502, AA-503, AA-504, AA-505, AA-506, AA-507, AA-509, AA-511, AA-515, AA-516, AA-517, AA-901, AA-902, AA-903, AA-904, AA-905, AA-906, AA-907, AA-909, AA-910, AA-911, AA-912, AA-913, AA-916, AA-928, AA-929, and AA-930, the permittee shall maintain sufficient records to document the daily/weekly visual observations:</p> <p>(a) Identification of stack, unit or process section for which information is given. (b) Dates and results of all required visual observation. To include Method 9 testing results if applicable. (c) If visible emissions were observed, document the emission unit; the date and time visible emissions were observed; the nature or cause of visible emissions; a description of corrective action and/or preventive measure taken; a statement of verification the emission unit and, if applicable, associated pollution control device are operating in accordance with design and standard procedures (otherwise, operating normally); and the date visible emissions were abated. [APC-S-2 II.B(10)]</p>
R-2	<p>For each Manufacturing Process (Red Balls, Rid-X, D-Con, Jet Dry, Finish Powder, and Finish Tablet), the permittee shall maintain sufficient records to document the following:</p> <p>(1) Rated Process Capacity. The maximum rated capacity of the process or unit identified, given in tons/hour. (2) Feed Input. Process rate in tons/year of material fed to the operation for each consecutive (or rolling) 12-month period. (3) The hours of operations for each 12-month consecutive (or rolling) period. (4) The calculated PM, PM10, and PM2.5 emission rates (TPY) for each manufacturing process and the total facility PM, PM10, and PM2.5 emission rates (TPY) for each consecutive (or rolling) 12-month period. (5) The calculations, data and a description of the method(s) used to determine the PM, PM10, and PM2.5 emission rate. [APC-S-2 II.B(11)]</p>

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### Record-Keeping Requirements:

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Condition No.	Condition
R-3	<p>Recordkeeping Requirements</p> <p>For each Emission Point for which a baghouse is the primary control device, the permittee shall maintain sufficient records to document the following:</p> <ul style="list-style-type: none"><li>(a) Pressure drop readings across the control device, including any readings outside the approved range and the corrective measure taken.</li><li>(b) Annual calibration checks</li><li>(c) Date and results of quarterly inspections</li><li>(d) Date and description of maintenance, service, or repair actions taken.</li><li>(e) The manufacturer's recommended pressure drop range for each baghouse or the site-specific pressure drop range, including documentation to establishing this range.</li></ul> <p>Records of inspections, maintenance and monitoring data shall be maintained in log form and be made available for review upon request by MDEQ personnel. [APC-S-2 II.B(10)]</p>

### Submittal/Action Requirements:

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Condition No.	Condition
S-1	<p>Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [APC-S-2 II.B(11)]</p>
S-2	<p>For Each Manufacturing Process (Red Balls, Rid-X, D-Con, Jet Dry, Finish Powder, and Finish Tablet), the permittee shall submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for the preceding calendar year. The report shall provide the following:</p> <ul style="list-style-type: none"><li>(a) Feed Input. Preprocess rate in tons/year of material fed to the operation for each consecutive (or rolling) 12-month period.</li><li>(b) The hours of operation for each consecutive (or rolling) 12-month period.</li><li>(c) The PM, PM10, and PM2.5 emission rates (TPY) for each manufacturing process and the total facility PM, PM10, and PM2.5 emission rates for each consecutive (or rolling) 12-month period.</li><li>(d) A description of the method(s) used to determine the rated process capacity, feed input, and the PM, PM10, and PM2.5 emission rates. [APC-S-2 II.B(11)]</li></ul>

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### Submittal/Action Requirements:

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Condition No.	Condition
S-3	For Emission Points AA-400, AA-502, AA-503, AA-504, AA-505, AA-506, AA-507, AA-509, AA-511, AA-515, AA-516, AA-517, AA-901, AA-902, AA-903, AA-904, AA-905, AA-906, AA-907, AA-909, AA-910, AA-911, AA-912, AA-913, AA-916, AA-928, AA-929, and AA-930, if visible emissions are observed, report the emission unit; the date and time visible emissions were observed; the nature or cause of visible emissions; a description of corrective action and/or preventive measure taken; a statement of verification the emission unit and, if applicable, associated pollution control device are operating in accordance with design and standard procedures (otherwise, operating normally); and the date visible emissions were abated. Also include the results of any Method 9 opacity observations conducted. [APC-S-2 II.B(11)]
S-4	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [APC-S-2 II.B(10)]

### Narrative Requirements:

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Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [APC-S-2 V.A]
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 10]
T-5	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [APC-S-2 X]

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### Narrative Requirements:

Condition No.	Condition
T-6	<p>General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:</p> <p>(a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and</p> <p>(b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]</p>
T-7	<p>General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:</p> <p>(a) Violation of any terms or conditions of this permit</p> <p>(b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or</p> <p>(c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.C]</p>
T-8	<p>General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [APC-S-2 II.B(15)b]</p>
T-9	<p>General Condition: Except for data determined to be confidential under the Mississippi Air &amp; Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]</p>
T-10	<p>General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [APC-S-2 II.B(15)c]</p>
T-11	<p>General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [APC-S-2 II.B(7)]</p>

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### Narrative Requirements:

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Condition No.	Condition
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B]
T-13	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.D]
T-15	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [APC-S-2 I.D(7)]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [APC-S-2 II.B(15)d]

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### Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <ul style="list-style-type: none"><li>(a) routine maintenance, repair, and replacement;</li><li>(b) use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;</li><li>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</li><li>(d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;</li><li>(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or</li><li>(f) any change in ownership of the stationary source" [APC-S-2 I.D(2)]</li></ul>
T-18	<p>General Condition: It shall not be a defense for a 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 conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 II.B(15)a]</p>
T-19	<p>General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [APC-S-2 IX]</p>
T-20	<p>General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [APC-S-2 II.B(5)]</p>

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Activity ID No.: PER20120001

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**AI0000012708 (continued):**

### Narrative Requirements:

Condition No.	Condition
T-21	<p>General Condition: Emergencies</p> <p>(a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [APC-S-2 II.B(10)]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 Section 10]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Reckitt Benckiser Inc  
Facility Requirements  
Permit Number:2380-00098  
Activity ID No.: PER20120001

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**AI0000012708 (continued):**

### Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-25	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [APC-S-2 VIII]</p>
T-26	<p>Operations and Maintenance: The permittee, at all times, shall maintain and operate all air emissions equipment and the associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. [APC-S-2 II.B(10)]</p>
T-27	<p>Operations and Maintenance: Dust from trucks and other fugitive emissions on plant property must be kept to a minimum. [APC-S-2 II.B(10)]</p>

## GENERAL INFORMATION

Reckitt Benckiser Inc  
815 North College Street  
Brandon, MS  
Rankin County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
12708	Reckitt Benckiser, Inc.	Official Site Name	2/27/1995	
238000098	Reckitt Benckiser	Air-Construction	4/9/1996	4/9/1996
238000098	Reckitt Benckiser	Air-Synthetic Minor Operating	3/11/1997	3/1/2002
238000098	Reckitt Benckiser	Air-Synthetic Minor Operating	10/5/2000	3/1/2002
MSR110140	Reckitt Benckiser	GP-Sara Title III	2/27/1995	11/5/2000
2812100098	Reckitt Benckiser	Air-AIRS AFS	4/9/1996	
12708	Reckitt Benckiser	No Exposure Certification	11/6/2000	12/27/2005
MSD037260973	Metal Textile Inc	Hazardous Waste-EPA ID	5/17/1983	10/1/1986
MSD037260973	Airwick Industriies	Hazardous Waste-EPA ID	10/1/1986	1/8/2010
238000098	Reckitt Benckiser	Air-Synthetic Minor Operating	12/3/2002	11/27/2007
12708	Reckitt Benckiser	No Exposure Certification	12/28/2005	12/15/2010
238000098	Reckitt Benckiser	Air-Synthetic Minor Operating	11/27/2007	10/31/2012
MSD037260973	Reckitt Benckiser Inc.	Hazardous Waste-EPA ID	1/8/2010	
MSR002003	Reckitt Benckiser, Inc.	GP-Baseline	1/4/2011	9/28/2015
238000098	Reckitt Benckiser Inc	Air-Synthetic Minor Operating	5/23/2013	4/30/2018

**Basin:** Pearl River Basin

**Location Description:**PG- Plant Entrance (General). Data collected by Mike Hardy on 11/2/2005. Elevation 410 feet.