



**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**

14306 Park Avenue Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

**PERMIT TO OPERATE**

B011330

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

**EXPIRES LAST DAY OF: JULY 2026**

**OWNER OF OPERATOR (Co.#1993)**

Church & Dwight Co. Inc  
17486 Nisqualli Rd  
Victorville, CA 92395

**EQUIPMENT LOCATION (Fac.#3294)**

Church & Dwight Co. Inc  
17486 Nisqualli Rd  
Victorville, CA 93535

**Description:**

CAT LITTER MANUFACTURING LINE consisting of:

**EQUIPMENT**

Capacity	Equipment Description
0	Limestone Line:
40	Limestone Pneumatic Conveyance System
0	Limestone Storage and Dosing Bin (BN-201)
0	Limestone Dilute Phase Pneumatic Conveyor (PN-209)
0	Limestone Dilute Phase Filter Receiver (F-210)
0	Limestone Storage and Dosing Bin Vent (BF-202)
0	Limestone Transfer Bin (TB-208)
1	Limestone Belt Scale Feeder (BS-205)
5	Limestone Bucket Elevator (BE-324)
0	Additive Super Sack
0	Supersack Unloader (US-302)
1.75	Additive Gravimetric Feeder (GF-303)
1	Additive Screw Conveyor (SC-322)
0	Additive Super Sack

Fee Schedule: 1 (c)

Rating: 349 bhp

SIC: 2899

SCC: 39999998

Location/UTM(Km):  
473E/3956N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Church & Dwight Co. Inc  
17486 Nisqualli Rd  
Victorville, CA 92395

By: **COPY**  
**Eldon Heaston**  
Air Pollution Control Officer

Capacity	Equipment Description
0	Supersack Unloader (US-320)
1	Additive Gravimetric Feeder (GF-321)
25	Product Paddle Mixer 1 (MX-328)
0	Deodorizer Bag Dump Hopper (for aqueous mix)(BD-311)
5	Deodorizer Bag-Dump Hopper Screw Conveyor
0	Aqueous Deodorizer Spray
0	Clay (Bentonite) Line:
3	Under Rail Clay Conveyor (BC-101)
10	Clay Bucket Elevator (BE-102)
7.5	Clay Overhead Belt Conveyor (BC-103)
0	Clay Storage Bin (BN-110)
1	Clay Belt Scale Feeder (BS-111)
15	Clay Screw Conveyor (SC-312)
7.5	Clay Bucket Elevator (BE-113)
0	Blue Paint Line:
50	Blue Paint Mixer (MX-601)
3	Blue Paint Screw Conveyor (SC-602)
2	Blue Paint Bucket Elevator (BE-603)
0	Blue Paint Limestone and Dosing Vessel (BN-604)
3	Blue Paint Bin Vibrating Bottom (VB-605)
0.25	Blue Paint Belt Scale Feeder (BS-703S)
0	Purple Paint Line:
50	Purple Paint Mixer (MX-610)
3	Purple Paint Screw Conveyor (SC-611)
2	Purple Paint Bucket Elevator (BE-612)
0	Reclaim Hopper
0	Reclaim Screw Conveyor
0	Purple Paint Limestone and Dosing Vessel (BN-613)
3	Purple Paint Bin Vibrating Bottom (VB-614)
0.25	Purple Paint Belt Scale Feeder (BS-704S)
0	Product Line:
50	Product Paddle Mixer 2 (MX-330)
5	Finished Product Belt Conveyor (BC-331)
7.5	Product Mixed Bucket Elevator to Product Screen (BE-313)
2	Product Screen (SS-400)
0	Intermediate Product Surge Bin (BN-401)
1	Product Belt Scale Feeder (Intermediate) (BS-701S)
7.5	Product Belt Conveyor (receives mixed product & painted limestone) (BC-705S)
5	Product Bucket Elevator to Product Line Chute (BE-706S)
5	Product Belt Conveyor to Product Line Chute (BC-708S)
0	Product Line Chute
7.5	Off Spec Product Screw
0	Off Spec Product Reclaim Hopper (C-712S)
0	Packing Surge Bin (BN-709S)
10	Packing Line
0	Miscellaneous:
0	Fragrance Feed Totes (7 @ 275 gallons)
0	Supply Totes
0	Supply Drums
0	Batching Tank (TK-306)

Capacity	Equipment Description
0	Dosing Tank (TK-307)

**CONDITIONS:**

1. The owner/operator shall maintain this equipment in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of air contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.

[District Rule 204]

2. This equipment shall not be operated unless the air pollution control devices permitted under valid District permit C011333 is properly operating in conjunction with this system.

[District Rule 204]

3. This Cat Litter Manufacturing Line shall not produce more than 525,600 tons per year of finished product, calculated on a rolling twelve month basis.

[District Rule 1303 - NSR Requirements]

This facility shall not emit more than 1,190 pounds of VOC per month of VOC-containing materials. Compliance with this limit is demonstrated by not exceeding the production limit specified on the Laundry Detergent Manufacturing Line and the Cat Litter Manufacturing Line.

[District Rule 442 - Usage of Solvents]

4. The owner/operator must use the following methodology when calculating VOC emissions:

a. When using a Category 1 fragrance (a fragrance with a vapor pressure of 0.191 mmHg or less, measured at 68 degrees F) in the Cat Litter Manufacturing Line, the owner/operator shall:

- (i) Verify that the fragrance does not contain more than 33 percent VOC by weight, and
- (ii) Calculate VOC emissions using an emission factor of 0.018 pound of VOC per ton of product processed.

b. When using a Category 2 fragrance (a fragrance with a vapor pressure greater than 0.191 mmHg and less than 0.4 mmHg, measured at 68 degrees F) in the Cat Litter Manufacturing Line, the owner/operator shall:

- (i) Verify that the Category 2 fragrance does not contain more than 25 percent VOC by weight; and,
- (ii) Calculate VOC emissions using an emission factor of 0.088 pound of VOC per ton of product processed; and,
- (iii) Limit the amount of product produced from the Cat Litter Manufacturing Line to 15 percent of the maximum production limit of 525,600 tons per year (equivalent to 79,000 tons per year, calculated on a rolling twelve month basis).

c. Any fragrance applied at a concentration of 0.01 percent (weight/weight) or less during Cat Litter Manufacturing may be classified as a Category 1 fragrance. VOC emissions shall be calculated using an emission factor of 0.018 pound of VOC per ton of product processed.

d. Any use of a fragrance in the Cat Litter Manufacturing Line other than those defined in 'a', 'b', or 'c' and/or an emission factor other than those defined in 'a', 'b' or 'c' requires prior approval from the District and a subsequent permit modification.

[District Rule 1303, basis: compliance verification]

5. The owner/operator of this facility shall maintain current and on-site for two (2) years a log of the following information, which shall be provided to District upon request:

a. A list of each fragrance used in the Cat Litter Manufacturing Line and its corresponding vapor pressure measured at 68 degrees F, VOC content, designation as either Category 1 or 2, and corresponding VOC emission factor pursuant to condition 3. This list shall be maintained and kept current.

b. Material Safety Data Sheets (MSDS), or other data provided by the manufacturer, for each fragrance that verifies the vapor pressure and VOC content as required by '4a'.

c. Monthly finished production, in pounds or tons for the Cat Litter Manufacturing Line, including subtotals for each of the product made with Category 1 and Category 2 fragrances.

d. Cumulative, last twelve-month finished production, in pounds or tons for the Cat Litter Manufacturing Line, including subtotals for each of the product made with Category 1 and Category 2 fragrances.

[District Rule 1303, basis: compliance verification]

6. This facility shall not discharge into the atmosphere, from any single source of emission whatsoever, any air contaminant, for a period or periods aggregating more than three minutes in any one hour, an opacity of twenty (20) percent or greater (No.1 on the Ringlemann

Chart). This includes the transportation and handling of materials from truck and rail load-out operations.  
[District Rule 401 - Visible Emissions and District Rule 403 - Fugitive Dust]

7. This facility shall maintain, and have available upon District request, a Fragrance Management Plan consisting of a written discussion of fragrance/odor thresholds and concentrations, and a description of operating procedures and practices mandated to control fragrance/odors and preclude nuisance. This plan shall apply to all fragrances/odors used in both the Cat Litter and Laundry Detergent Manufacturing Lines under valid District permits B011330 and B011331.  
[District 402 - Nuisance]

8. At the District's request, this facility must install air pollution control devices, specific to the control of odor, on all equipment venting to the atmosphere and any source of odor release.  
[District 402 - Nuisance]

9. All VOC containing materials, whether in its form for intended use or as a waste or used product, shall be stored in nonabsorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying, and disposed of in a manner to prevent evaporation of VOCs into the atmosphere at the Facility.  
[District Rule 442(C)(3)]

10. The owner/operator shall conduct a minimum program of inspection and maintenance on the Limestone Storage and Dosing Bin Vent and the Receiver Bin Vent inclusive of the following, which shall be maintained current and on-site for two (2) years, and made available upon District request:

- a. Weekly Visible Emission Determinations, date and result, using the following procedures: Ensure that the observer's back is to the sun, or if indoors, the observation spot provides a clear view of the emission point, observe the emission point for a period of one minute, and designate the emission point as "dusting" or "not dusting". If "dusting" is occurring, the owner/operator must conduct a Visible Emission Evaluation using USEPA Method 22 (for a 3-minute observation period), and USEPA Method 9, if necessary, or shut down the equipment immediately until repairs are made.
- b. Quarterly inspection date and results;
- c. Date of filter replacements; and,
- d. Date and nature of any system repairs.

In addition, the owner/operator shall maintain, on-site, a minimum inventory of replacement bin filters for this equipment that assures compliance with these conditions.

[District Rule 401 - Visible Emissions, District Rule 403 - Fugitive Dust and District 402 - Nuisance, basis: compliance demonstration]

11. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.  
[District Rule 107(b); H&S Code 39607 & 44341-44342; and 40 CFR 51, Subpart A]