

SUPPLEMENT TO PERMIT NO. 264-99

Reckitt Benckiser, Inc.

Rockwood, Michigan

May 11, 2000

GENERAL CONDITIONS

1. Rule 201(1) - The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule.
2. Rule 201(4) - If the installation, reconstruction, relocation, or alteration of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the person to whom this permit was issued, or the designated authorized agent, shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.
3. Rule 201(6)(a) - If this Permit to Install is issued for a process or process equipment located at a stationary source that is subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, trial operation is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install and until the appropriate terms and conditions of this Permit to Install have been incorporated into the Renewable Operating Permit. Upon incorporation of the appropriate terms and conditions into the Renewable Operating Permit, this Permit to Install shall become void.
4. Rules 201(6)(b) - If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and condition of this Permit to Install.
5. Rule 201(8) and Section 5510 of Act 451, P.A. 1994 - The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Departments' rules or the Clean Air Act.
6. Rule 219 - The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b) and (c) of R 336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.
7. Rule 901 - Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
8. Rule 912 - The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air

contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the District Supervisor within 10 days, with the information required in this rule.

9. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future applicable requirements which may be promulgated under Part 55 of Act 451, P.A. 1994 or the Clean Air Act.
10. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
11. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.
12. Rule 301 - Except as provided in subrules (2) and (3) or unless the special conditions of this Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303.
 - a) A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a special condition of this permit to install.
13. Rule 370 - Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2).
14. Rule 285 - Except as allowed by Rule 285 (a), (b), and (c), applicant shall not substitute any fuels, coatings, nor raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by the Air Quality Division.
15. The Department may require the applicant to conduct acceptable performance tests, at the applicant's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001.

SPECIAL CONDITIONS
(9 special conditions)

1. For purposes of this permit to install, all requirements for notifications or submittal of records to or approvals by the District Supervisor, Air Quality Division should be submitted to the Director of Compliance and Enforcement, Air Quality Management Division, Wayne County, Department of Environment unless you are otherwise notified in writing by the Air Quality Division. At no time shall notifications or submittals to or approvals by both agencies be required pursuant to this permit.
2. The particulate emission from the tabs process, hereinafter EU-Tabs Process, shall not exceed 0.03 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis, nor 0.680 pounds per hour, nor 2.98 tons per year. (R 336.1225, R 336.1331)
3. The particulate emission from the tablet machine process, hereinafter EU-Tablet Machines, shall not exceed 0.03 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis, nor 0.383 pounds per hour, nor 1.68 tons per year. (R 336.1225, R 336.1331)
4. The particulate emission from the tabs packaging process, hereinafter EU-Tabs Packaging, shall not exceed 0.03 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis, nor 0.656 pounds per hour, nor 2.88 tons per year. (R 336.1225, R 336.1331)
5. Visible emissions from EU-Tabs Process, EU-Tablet Machines, and EU-Tabs Packaging shall not exceed a 6-minute average of 10 percent opacity, except as specified in Rule 301(1)(a). (R 336.1225, R 336.1301, R 336.1331)
6. Applicant shall not operate EU-Tabs Process, EU-Tablet Machines, nor EU-Tabs Packaging unless baghouse controls are installed and operating properly. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)
7. The exhaust gases from the EU-Tabs Process, EU-Tablet Machines, and EU-Tabs Packaging shall be discharged unobstructed vertically upwards to the ambient air from stacks with maximum diameters and minimum exit points as listed in Table 1. (R 336.1225)

Table 1: Stack Parameters

Emission Unit	Stack Maximum Diameter	Stack Minimum Exit Point
EU-Tabs Process	14 inches	83 feet
EU-Tablet Machines	12 inches	83 feet
EU-Tabs Packaging	14 inches	83 feet

8. Applicant shall not operate EU-Tabs Process, EU-Tablet Machines, nor EU-Tabs Packaging unless a gauge which measures the pressure drop across the emission unit's baghouse and sounds an alarm when the pressure drop is outside the range specified in the Malfunction Abatement Plan is installed and operating properly. Applicant shall inspect the alarm systems on a once per week basis and maintain a record of each inspection. Inspection records shall include the date, the time, the initials of the person(s) inspecting the alarm, and the results of the inspection. Inspection records shall be kept on file for a period of at least five years and made

available to the Department upon request. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)

9. Within 30 days after the commencement of commercial operation, the applicant shall submit to the District Supervisor, Air Quality Division for approval a Malfunction Abatement Plan (MAP) for the following equipment: EU-Tabs Processing baghouse, EU-Tablet Machines baghouse, and EU-Tabs Packaging baghouse. This MAP shall comply with all provisions of R 336.1911(2). The MAP must be approved by the District Supervisor, Air Quality Division within 12 months after commencement of commercial operations. If the District Supervisor has not approved the MAP within 12 months after commencement of commercial operations, the District Supervisor, Air Quality Division must notify the applicant and provide a written report of the reasons that the MAP has not been approved. Within 60 days after receipt of the written report, the applicant shall submit a revised MAP. Applicant shall implement and maintain the above MAP upon receipt of notice of approval from the District Supervisor, Air Quality Division. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.1911)