

**SOUTHWEST OHIO
AIR QUALITY AGENCY**

6/14/2012

Certified Mail – Return Receipt Requested

Jack Dison
The Procter & Gamble Company
5201 Spring Grove Avenue
Cincinnati, OH 45217

Re: NOTICE OF VIOLATION – SO2 HOURLY EMISSION RATE
Facility ID: 1431390903
Emissions Unit: P023
The Procter and Gamble Co.
Location: 5201 Spring Grove Avenue,
Cincinnati, OH 45217
Hamilton County

Dear Jack Dison:

On May 26, 2012 Procter and Gamble personnel called in a malfunction report for emission unit P023. They had stated that the SO2 scrubber had a valve malfunction that lead to the release of SO2 emissions on May 25, 2012. As indicated in subsequent phone calls and an email summary of the release, the cause of the release was determined to be the failure by plant personnel to re-open the manual valves to the pH probes following a routine maintenance shutdown. This is not considered a malfunction. It was also determined that approximately 2000 pounds of SO2 were released between 3:00 PM and 5:00 PM on May 25, 2012. Based upon this information, emissions unit P023 operated in violation of the Terms and Conditions of Permit to Install and Operate 14-05991 and Ohio Revised Code (ORC) Section 3704.05(C).

The air pollution permits specify the use of a scrubber to control sulfur dioxide (SO2) emissions from emission unit P023. Additionally, the SO2 emissions shall not exceed 4.50 pounds per hour during steady state operations or 6.71 pounds per hour during cold start-ups. Procter and Gamble did not meet the SO2 emission limitations during the incident on May 25, 2012 when 2000 pounds of SO2 were emitted over a two hour period.

Procter and Gamble is requested to submit to this agency a compliance plan outlining the steps which will be taken to bring the above emissions unit into compliance with the SO2 emission rate. Also include in this plan the steps that will be taken to ensure that the control equipment is properly maintained and operated in the future. Please submit this information within 30 days of receipt of this letter.



Jack Dison
The Procter and Gamble Co.
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Acceptance by the Ohio EPA of a compliance plan and schedule does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you have any questions, please contact me at (513) 946-7709.

Sincerely,

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

Thomas P. Wittekind
Southwest Ohio Air Quality Agency

cc: Bruce Weinberg, Central Office, Ohio EPA
William MacDowell, Region 5 U.S. EPA