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Facility Name: **Hedstrom Corporation**

Application Number: **03-1354**

Date: **October 15, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement

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of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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The air contaminant emissions units listed below comprise the Permit to Install for **Hedstrom Corporation** located in **Ashland** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
R033	10" 360 degree Printer #2-top	Compliance with permit allowable emission limits	3745-31-05 3745-21-07 (G) (2)	8 lbs OC/hr 40 lbs OC/day 7.60 TPY (Includes cleanup) (See Additional Special Terms and Condition's)
R034	10" 360 degree Printer #2- bottom	Compliance with permit allowable emission limits	3745-31-05 3745-21-07 (G) (2)	8 lbs OC/hr 40 lbs OC/day 7.60 TPY (Includes cleanup) (See Additional Special Terms and Condition's)

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	15.20

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

INTRODUCTION:

This permits allows Hedstrom Corporation (hereinafter referred to as "permittee") to install two new 10" 360 degree printers (top and bottom), Ohio EPA emissions units numbers, R033 and R034, respectively. Each printer uses photochemically reactive inks and is subject to the requirements of OAC rule 3745-21-07(G)(2). Since the ink is applied without atomizing or spraying, they are not subject to the requirements of OAC rule 3745-17-11 for particulate emissions. The permittee is a Title V "Major Source" for Organic Compounds (OC) and Hazardous Air Pollutants (HAPs)

A. EMISSION LIMITATIONS:

1. Emission units R033 and R034 shall comply with the following emission limitation individually:

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Hourly Limit- 8 pounds per hour (lbs/hr) Organic Compounds
 Daily Limit - 40 pounds per day (lbs/day) Organic Compounds
 Annual Limit- 7.60 TPY Organic Compounds

2. The hourly and daily emission limitations for organic compounds apply to all inks and cleanup materials employed in emissions units R033 and R034.

B. OPERATIONAL RESTRICTIONS:

1. This permit allows for the use of the inks and non-photochemically reactive cleanup materials specified by the permittee in their application for PTI # 03-11354. In conjunction with the best available technology (BAT) requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the inks and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1-hour maximum ground level concentration to the MAGLC. The modeling for each pollutant is as follows:

Pollutant	TLV (ug/m3)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 hour Maximum Ground- Level Concentration at the Fenceline (ug/M3)	Maximum Acceptable Level Concentration (MAGLC) (ug/M3)
Cyclohexanone	100,000	1.92*	21.08	2380.95
		* potential-to-emit 0.96 pounds per hour of cyclohexanone for each emissions unit for a total of 1.92 pounds per hour combined.		

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, NWDO is required.

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- a. any change in the composition of the inks or cleanup materials, or the use of new inks or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "Modification" as defined in OAC rule 3745-31-01; and,
- d. any change in the composition of the coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].

C. RECORDKEEPING REQUIREMENTS:

1. The permittee shall collect daily records which list the following information for all inks/cleanup materials employed in emission units R033 and R034:
 - a. the company identification for each ink and cleanup material employed;
 - b. the number of gallons of each ink, photochemically reactive cleanup material employed;
 - c. the OC content, in lbs/gal for each ink "as

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applied";

- d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation; and,
- f. the average hourly organic compound emission rate for all inks and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. These records shall be retained in the company's files for a period of not less than five years and shall be made available to the Ohio EPA, upon request, for review during normal business hours.

D. REPORTING REQUIREMENTS:

- 1. The permittee shall submit separate quarterly deviation (excursion) reports for each emissions unit R033 and R034 which shall include the following:
 - a. an identification of each day on which the average hourly OC emission rate from coating and cleanup material exceeded 8 lbs/hr, and the actual average hourly emissions for each such day; and,
 - b. an identification of each day on which the daily OC emission rate from coating and cleanup material exceeded 40 lbs/day, and the actual OC emissions rate for each such day.
- 2. A copy of each such record which identifies the exceedances in (D)(1)(a) and (D)(1)(b) above shall be attached to the quarterly report. Accompanying the record, the permittee shall indicate, in writing, the probable cause(s) of the excursion(s) and the steps which have been implemented to correct the violation(s)

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and prevent any such future occurrences.

3. The permittee shall submit separate annual reports for each emissions unit R033 and R034 which specify the total OC emissions in tons per year from each emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall address the previous calendar year.

E. Testing requirements:

1. Any determination of OC content*, solids content, or density of a ink and/or cleanup material shall be based on the ink/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the ink/cleanup material. The permittee shall determine the composition of the inks/cleanup material by formulation data supplied by the manufacturer of the ink/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses the formulation data supplied by the manufacturer, to determine data used on the calculation of the OC of the inks/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "OC content" means all organic compounds that are in a ink/cleanup material expressed as pounds of OC per gallon.

2. For each emissions unit R033 and R034, compliance with their individual OC emission limitation of Section I (A.1 and A.2) will be determined by the individual recordkeeping requirements of Section C (C.1 and C.2).

F. Miscellaneous Requirements:

1. None.