OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Ashtabula County
Application No: 02-9679

CERTIFIED MAIL

January 24, 1996

ELCO CORPORATION
CHARLES GUY
1100 NORTH STATE ROAD
ASHTABULA, OH 44004

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

RECEIVED
JAN 31 1996
OHIO EPA NEDO

cc: US EPA
NORTHEAST DISTRICT OFFICE, DAPC
THE ELCO CORPORATION

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

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State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 02-9679
APS Premise No. 0204000417
Permit Fee: $400.00

Name of Facility: ELCO CORPORATION

Person to Contact: CHARLES GUY

Address: 1100 NORTH STATE ROAD
ASHTABULA, OH 44004

Location of proposed source(s): 1100 NORTH STATE ROAD
ASHTABULA, OHIO

Description of proposed source(s):
PRODUCTION OF SODIUM DIALKYDITHIOPHOSPHATE AND ZINC DIALKYDI THIOPHOSPHATE.

Date of Issuance: January 24, 1996

Effective Date: January 24, 1996

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

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 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 prove to be inadequate or 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 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, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for ELCO CORPORATION located in Ashtabula County. The sources 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
P001	Production of sodium and zinc dialkyl-dithiophos-phates	Use of primary and secondary scrubber to control H_2S emissions	3745-31-05	5.14 lbs/day and 0.94 TPY of VOC emissions; 0.02 lb/hr and 0.09 TPY of H_2S emissions

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
VOC	0.94
H_2S	0.09

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 OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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.

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 OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Prohibition of Nuisances

   a. The air contaminant emission unit identified in this permit may not cause a public nuisance in such a manner as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property in violation of OAC Rule 3745-15-07.

b. If probable cause exists indicating the emission unit is causing or contributing to a nuisance in violation of OAC Rule 3745-15-07, the owner or operator of the emission unit shall be required to submit and implement a control program which will bring the emission unit into compliance.

2. Allowable Mass Emission Limitations

a. The volatile organic compound (VOC) emissions from this emission unit shall not exceed 5.14 lbs/day and 0.94 ton/year.

b. The hydrogen sulfide (H_2S) emissions from this emission unit shall not exceed 0.02 lb/hr and 0.09 ton/year.

3. Monitoring and Recordkeeping Requirements

a. The pH of the primary and secondary scrubber liquor shall be maintained at a minimum of 12 during any time the emission unit is in operation.

b. This facility shall operate and maintain equipment to monitor and record the following parameters at this emission unit:

i. the pH of the primary scrubber liquor on a continuous basis;

ii. the pH of the secondary scrubber liquor at least once per hour;

iii. the temperature of the primary scrubber liquor and of the secondary scrubber liquor at least once per hour;

iv. the primary scrubber liquor level at least once per hour;

v. the pump pressure of the water supply for the secondary scrubber at least once per hour;

vi. for each addition of sodium hydroxide to the primary scrubber liquor, the weight of sodium hydroxide in pounds and the volume of water in gallons shall be recorded; and

vii. for each addition of sodium hydroxide to the secondary scrubber liquor, the weight of sodium hydroxide in pounds and the volume of water in gallons shall be recorded.

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

4. Reporting Requirements

a. This facility shall submit semi-annual reports to the Ohio EPA Northeast District Office which summarize the following information for operations at this emission unit during the previous six calendar months:

i. for each period where the requirements noted in term 3(a) are exceeded, the following parameters shall be reported:

1. the date and duration of occurrence;

2. the estimated H_2S emissions in pounds, along with supporting calculations;

3. the pH of the primary and secondary scrubber liquors;

4. the temperatures of the primary and secondary scrubber liquors;

5. the pump pressure of the secondary scrubber liquor supply;

6. the total quantity of the sodium hydroxide added to the primary and secondary scrubber liquors;

7. a description of any corrective actions taken to address any exceedance of requirements as noted in term 3 (a) above; and

8. should no exceedances of the requirements noted in term 3 (a) occur, then the report should state that no exceedances occurred.

ii. an estimate of the actual H_2S emissions in tons per six months for each semi-annual report and in tons per year for the second semi-annual report; and

iii. statement(s) noting the allowable VOC and H_2S limits as specified in terms 2(a) and (b) above.

b. The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

5. Performance Testing

a. The permittee shall conduct, or have conducted, performance testing of the subject air contaminant emission unit(s) in accordance with procedures approved by the Agency. One copy of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director or an Ohio EPA representative shall be allowed to witness the tests, examine testing equipment and require the acquisition or submission of data and information necessary assure that emission unit operation and testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.

b. A completed Intent to Test form shall be submitted to the Northeast District Office of the Ohio EPA within 30 days of start-up operations of the emission unit and control system(s). This notice shall be made at least thirty (30) days in advance and shall specify the emission unit operation parameters, the proposed test procedures and the time, date, place and person(s) conducting such tests.

c. One copy of the test results shall be submitted within thirty (30) days after the completion of the performance test.

d. Tests shall be performed for the following emission unit(s) and pollutants:

P001	Hydrogen Sulfide