



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
BUTLER COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

**Application No: 14-05756
Fac ID: 1409070663**

DATE: 8/25/2005

Arkay Plastics Incorporated
Dale Hall
7728 Service Center Drive
West Chester, OH 45069

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 Review Appeals Commission 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 within thirty (30) days after the notice of the Directors 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 8/25/2005
Effective Date: 8/25/2005**

FINAL PERMIT TO INSTALL 14-05756

Application Number: 14-05756
Facility ID: 1409070663
Permit Fee: **\$200**
Name of Facility: Arkay Plastics Incorporated
Person to Contact: Dale Hall
Address: 7728 Service Center Drive
West Chester, OH 45069

Location of proposed air contaminant source(s) [emissions unit(s)]:
**240 American Way
Monroe, Ohio**

Description of proposed emissions unit(s):
Modification of PTI 14-05689 to allow the use of photochemically reactive materials in emissions unit R001.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

Arkay Plastics Incorporated
PTI Application: 14-05756
Issued: 8/25/2005

Facility ID: 1409070663

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

Arkay Plastics Incorporated
PTI Application: 14-05756
Issued: 8/25/2005

Facility ID: 1409070663

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

Arkay Plastics Incorporated
 PTI Application: 14-05756
 Issued: 8/25/2005

Facility ID: 1409070663

13. Source Operation and Operating Permit Requirements 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

Pollutant
 VOC

Tons Per Year
 10.39

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Automated Paint Spray Booth 1 - modification	OAC rule 3745-31-05 (A)(3)	<p>Volatile Organic Compound (VOC) emissions from coatings shall not exceed 53.6 lbs/day, excluding cleanup.</p> <p>VOC emissions from cleanup shall not exceed 109.5 lbs/month.</p> <p>VOC emissions shall not exceed 10.39 tons per year (TPY), including cleanup</p> <p>See terms and conditions A.2.b., A.2.c., B.1. and B.2.</p>
	OAC rule 3745-21-07(G)(2)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).</p> <p>See term and condition A.2.d .</p>

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the specified mass emissions rate limitations, coating and cleanup material VOC content limitations, and usage limitations.

- 2.b** The VOC content of each coating employed in this emissions unit shall not exceed 6.3 lbs/gallon, as applied.
- 2.c** The VOC content of each cleaning material employed in this emissions unit shall not exceed 7.3 lbs/gallon, as applied.
- 2.d** VOC emissions from this emissions unit shall not exceed 8 lbs/hr or 40 lbs/day when applying coatings identified as containing Photochemically Reactive Materials (PRM) as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

- 1.** The maximum amount of coatings employed in this emissions unit shall not exceed 8.5 gallons/day and 3089 gallons/year.
- 2.** The maximum amount of cleanup materials employed in this emissions unit shall not exceed 15 gallons/month and 180 gallons/year.

C. Monitoring and/or Record keeping Requirements

- 1.** The permittee shall collect and record the following information for each day for the coating operation:
 - a.** The company identification for each coating and cleanup material employed, by type of coating and cleanup material.
 - b.** The number of gallons of each coating and cleanup material employed, by type of coating and cleanup material.
 - c.** The volatile organic compound content of each coating and cleanup material, in pounds per gallon, by type of coating and cleanup material.
 - d.** The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day, by type of coating or cleanup material (b x c).
 - e.** The total combined volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.
 - f.** Documentation on whether or not each coating and organic cleanup material is a

photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. The definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5). Also, hourly record keeping is not required to document compliance with the 8 lb/hr limit in A.2.d because the potential to emit volatile organic compounds in this emissions unit is less than 8 lb/hr.]

2. The permittee shall maintain monthly records of the VOC emissions and the material use from the coatings and cleanup materials for this emissions unit. The VOC emissions shall be summarized in tons per year at the end of each calendar year.
3. The permit to install for emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m³): 188,404

Total Maximum Hourly Emission Rate (lbs/hr): 2.41

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m³): 0.5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4485

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine

Emissions Unit ID: **R001**

that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for

the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in term A.2.b and A.2.c). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that emissions unit R001 emitted more than 40 pounds per day of volatile organic compounds when photochemically reactive materials were applied during that date.

The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 45 days of the occurrence.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing an exceedance of the coatings and/or inks or cleanup material usage limitations (i.e., usage limitations in term B.1. and B.2.) The reports shall include a calculation of the VOC emissions over the deviation period. The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services of the total VOC emissions and the total coating and cleanup material usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emissions Limitation

Emissions Unit ID: **R001**

53.6 lbs VOC/day from the application of coating material

Applicable Compliance Method

Compliance with the daily VOC emissions limitations shall be demonstrated by the record keeping requirement in term and condition C.1.

Emissions Limitation

40.0 lbs VOC/day from the application of coating material when using photochemically reactive materials

Applicable Compliance Method

Compliance with the daily VOC emissions limitations shall be demonstrated by the record keeping requirement in term and condition C.1.

Emissions Limitation

109.5 lbs VOC/month from the application of cleanup material

Applicable Compliance Method

Compliance with the monthly VOC emissions limitation shall be demonstrated by the record keeping requirement in terms and conditions C.1. and C.2.

Emissions Limitations

10.39 TPY VOC from the application of coatings and cleanup material

Applicable Compliance Method

Compliance with the annual VOC emissions limitations shall be demonstrated by a summation of the VOC emissions as recorded in term and condition C.2. for coatings and cleanup materials, divided by 2000 pounds, such that the summations equal Tons per Year (TPY) VOC emissions.

Emissions Limitations

6.3 pounds of VOC per gallon of coating, as applied,

7.3 pounds of VOC per gallon of cleanup material, as applied

Applicable Compliance Method

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the coating usage limitations in term and condition B.1. shall be demonstrated by the record keeping in terms and conditions C.1. and C.2.
3. Compliance with the cleanup material usage limitations in term and condition B.2. shall be demonstrated by the record keeping in terms and conditions C.1. and C.2.

F. Miscellaneous Requirements

1. The terms and conditions of this Permit To Install shall supercede the terms and conditions for emissions unit R001 in Permit To Install 14-04641 as issued on September 1, 1999 and Permit To Install 14-05689 as issued on June 30, 2005.

Arkay Plastics Incorporated
PTI Application: 14-05756
Issued: 8/25/2005

Facility ID: 1409070663

Emissions Unit ID: **R001**

SIC CODE 3089 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R001
 EMISSIONS UNIT DESCRIPTION Automated Paint Spray Booth 1
 DATE INSTALLED 2/05

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	53.6 lbs/day	5.92	53.6 lbs/day	10.39
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the specified mass emissions rate limitations, coating and cleanup material VOC content limitations, and usage limitations.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: Toluene