



RECEIVED - SWO AIR
POLLUTION CONTROL

AUG 22 1990

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020 Fax (614) 644-2329

Richard F. Celeste
Governor

August 15, 1990

CERTIFIED MAIL

Re: Modification to Permit to Install No. 14-1339
Hamilton County

Senco Products, Inc.
8485 Broadwell Rd.
Cincinnati, OH 45244

Attention: Anthony Muto

Dear Sir:

Enclosed please find a modification to the Ohio EPA Permit to Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 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 and the Environmental Law Division of the Office of the Attorney General 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, OH 43215.

Very truly yours,

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

Enclosure

cc: US EPA
~~Southwestern-Ohio Air Pollution Control Agency~~

Issuance Date: 8-15-90

Effective Date: 8-15-90

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFICATION TO PERMIT TO INSTALL

Name of Applicant: Senco Products, Inc.
Address: 8485 Broadwell Rd.
City: Cincinnati
Telephone: (513) 388-2000

The Ohio EPA has received a request for a modification for the Ohio EPA Permit to Install referenced above.

The Permit to Install issued to Senco Products, Inc. (PTI No. 14-1339) is hereby modified in the following manner:

Special Terms and Conditions.

The reason for the modification is:

This permit is being modified to allow for a higher VOC content of the coatings applied without increasing annual emissions.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

Ohio Environmental Protection Agency



Director



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

RECEIVED - SWO AIR
POLLUTION CONTROL

JUL 31 1989

Richard F. Celeste
Governor

June 20, 1989

Re: Modification to Permit to
Install No. 14-1339

Hamilton County

Senco Products Inc.,
Anthony Muto
8485 Broadwell Rd.
Cincinnati, Ohio 45244

CERTIFIED MAIL

Dear Sir:

Enclosed please find a modification to the Ohio EPA Permit to
Install referenced above which will modify the terms and
conditions.

If you have any questions regarding this action, please contact
the agency to which you submitted your original application.

Very truly yours,

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

Enclosure

cc: US EPA
Southwestern Ohio Air Pollution Control Agency

Issuance Date: June 20, 1989

Effective Date: June 20, 1989

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFICATION TO PERMIT TO INSTALL NO. 14-1339

Name of Applicant: Senco Products Inc.
Address: 8485 Broadwell Rd.
City: Cincinnati, Ohio 45244
Telephone: (513) 388-2000

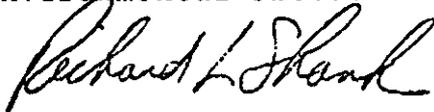
The Ohio EPA has received a request for a modification for the Ohio EPA Permit to Install referenced above.

The Permit to Install issued to Senco Products Inc. (PTI No. 14-1339) is hereby modified in the following manner: Special terms and conditions.

The reason for this modification is: This permit is being modified as a result of the Environmental Board of Review case of Senco Products Inc., vs Shank, Case No. EBR 311700.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

Ohio Environmental Protection Agency



Director

BEFORE THE ENVIRONMENTAL BOARD OF REVIEW
STATE OF OHIO

SENCO PRODUCTS, INC. : CASE NO. EBR 311700
: :
Appellant, : :
: :
vs. : STIPULATION AND
: SETTLEMENT AGREEMENT
: :
RICHARD SHANK, DIRECTOR : :
OF ENVIRONMENTAL PROTECTION, : :
: :
Appellee. : :

The parties hereto, Appellant, Senco Products, Inc. (hereinafter "Senco") and Appellee, Richard Shank, Director of Environmental Protection (hereinafter "Director" or "Ohio EPA"), having engaged in settlement discussions and having reached an agreement which is set forth in the following paragraphs hereby jointly stipulate as follows:

1. Senco was issued Permit to Install (PTI) No. 14-1339 on November 18, 1987. This PTI governs two air contaminant sources (Ohio EPA source Nos. K001 and K002). Senco was also issued Permit to Operate (PTO) Nos. 1431340977 K003 and 1431340977 K004 on December 4, 1987. These PTOs govern air contaminant sources designated as "Bandline No. 3" and "Bandline No. 4".

2. Senco appealed the issuance of the PTI and PTOs alleging, inter alia, that the permits did not employ best available technology and that the Director acted improperly in imposing "Total New Source Emissions" in the PTI.

3. The parties have engaged in settlement discussion in an attempt to resolve this appeal. As a result of those discussions, an agreement has been reached regarding the permits which are the subject of this appeal.

4. The parties jointly agree that new permits shall be issued by the Director which are identical in substance to the permit attached as Attachment A.

5. Senco agrees to the modifications of the permits as described in Attachment A and waives any right to contest the lawfulness or reasonableness of such modification before the Environmental Board of Review or any court of competent jurisdiction.

6. The entering of this Stipulation and Settlement Agreement shall in no way be construed as an admission by the Director that the permits as originally promulgated and subsequently appealed from by Senco were not reasonable or lawful.

7. The parties agree that this case shall be deemed automatically dismissed after this Board receives a copy of the Director's Final Action issuing new permits in accordance with this Stipulation and Settlement Agreement.

Respectfully submitted,

ANTHONY J. CELEBREZZE, JR.
ATTORNEY GENERAL OF OHIO

Karen S. Cleveland
KAREN S. CLEVELAND
Assistant Attorney General
Environmental Enforcement Section
30 East Broad Street, 17th Fl.
Columbus, Ohio 43266-0410
(614) 466-2766

Russel S. Frye by KSC
RUSSEL S. FRYE
Smith & Schnacke
2900 DuBois Tower
511 Walnut Street
Cincinnati, Ohio 45202

*per telephone
authorization*

<u>Ohio EPA Source No.</u>	<u>Source Identification</u>	<u>BAT Determination</u>	<u>Applicable Ohio EPA rule</u>	<u>Allowable Emission (lb/hr, lb/MMBTU, gr/DSCF, etc.)</u>
K001	Bandline coater #S00579/S00542	Incinerator	3745-31-05 3745-21-09 (U)(1)(b)	5.70 lbs VOC/hr
K002	Bandline coater #S00568/S00541	Same as above	Same as above	Same as above

SUMMARY
TOTAL NEW SOURCE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	39.8

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

PERMIT TO OPERATE APPLICATION

A Permit to Operate Application and a \$15 application fee must be submitted to the appropriate field office for each source in this Permit to Install. In accordance with OAC rule 3745-35-02, the application shall be made at least ninety days prior to start-up of the source.

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.

MALFUNCTION/ABATEMENT

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.

SPECIAL TERMS AND CONDITIONS

1. Based on a monthly emission rate of 32458 lbs., prior to a capture and control efficiency of 81%, the total gallons of each individual coating applied during a month shall be limited in accordance with the following equation:

$$\begin{aligned} & 5.92 \frac{\text{lb VOC}}{\text{gal ctg}} \times (X) \quad + \quad 5.62 \frac{\text{lb VOC}}{\text{gal ctg}} \times (Y) \\ & \qquad \qquad \qquad = \quad 32,458 \frac{\text{lbs VOC}}{\text{month}} \end{aligned}$$

where: x = gallons/month, LSM2525, Imperial
y = gallons/month, E0100X-34 & 36, Pierce & Stevens

The number of gallons of each coating material, if used exclusively for a month, shall not exceed:

<u>Coating</u>	<u>VOC content (lb VOC/gal)</u>	<u>Maximum Gallons Per Month</u>
Imperial	5.92	5483.0
Pierce & Stevens	5.62	5775.5

2. This facility shall maintain monthly records which list the following information for each surface coating employed in this source.

- (a) the company identification of the surface coating;
- (b) the number of gallons employed;
- (c) the VOC content, in pounds of VOC per gallon of coating;
- (d) the VOC content, in pounds of VOC per gallon of coating, minus water;
- (e) the water content, in percent by volume; and
- (f) the nonvolatile (solids) content, in percent by volume.

These monthly records, as well as any supporting coating analyses and computations, shall be retained in the company's

SENCO PRODUCTS INC
APPLICATION NO 14-1339

files for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

To the extent that all four (4) bandlines at the Senco Products plant are supplied with glue from a single source, the records on coating usage required by this provision may be expressed in terms of aggregate coating usage for all four bandlines.

3. This facility shall submit quarterly reports to the Ohio EPA field office which summarize the following information for each coating employed in this source during the previous three calendar month: company identification of the surface coating, the total number of gallons employed, the VOC content (in pounds VOC per gallon of coating, minus water), the water content and the non-volatile (solids) content. The quarterly report shall also include all three hour periods during which the average incineration temperature of the control device is more than 5% below the average temperature measured during the most recent performance test which demonstrated compliance. The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters. ,

4. Clean-up solvent (acetone) usage on K001 and K002 is restricted to 850 gallons per 12 month period. Senco shall maintain a monthly record of total clean-up solvent usage. Senco may devise their own method of tracking clean-up solvent usage. However, their method must be approved by the SWOAPCA.

5. Senco Products may substitute any coating similar to those described on Condition No. 1, so long as the VOC content of the coating does not exceed 5.92 lb. VOC/gal. and the maximum gallons used in any one month does not exceed 5483 gallons of coating per month.