



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
Muskingum County
Application No: 06-5329

CERTIFIED MAIL

April 1, 1998

OHIO PLASTICS COMPANY
KENNETH MAYLE
119 WEST SECOND STREET
FRAZEYSBURG, OH 43822-0346

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 with the Environmental Review Appeals Commission 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC

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



Permit to Install Terms and Conditions

Application No. 06-5329
APS Premise No. 0660000023
Permit Fee: \$1800.00

Name of Facility: OHIO PLASTICS COMPANY

Person to Contact: KENNETH MAYLE

Address: 119 WEST SECOND STREET
FRAZEYSBURG, OH 43822-0346

Location of proposed source(s): 119 WEST SECOND STREET
FRAZEYSBURG, OHIO

Description of proposed source(s):
MODIFICATION OF TWO DRYERS AND SIX SPRAY BOOTHS AND ADDITION
OF ONE ROBOTIC SPRAY BOOTH.

Date of Issuance: April 1, 1998

Effective Date: April 1, 1998

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. Schreyer

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)

OHIO PLASTICS COMPANY
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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 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for OHIO PLASTICS COMPANY located in Muskingum 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.

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--|---|---|--|
| P001 Mod | Self-designed bake oven (This modification eliminates a 14 hour per day operation limit) | Compliance with OAC rule 3745-21-07 (G) (1) | 3745-21-07 | Emissions from this source shall not exceed 3 pounds of organic material in any one hour nor 15 pounds of organic material in any one day. |
| | | | 3745-31-05 | Emissions of organic materials from this source is limited to 0.40 ton per year. |
| P002 Mod | Tunnel dryer (This modification eliminates a 14 hour per day operation limit) | Compliance with OAC rule 3745-21-07 (G) (1) | 3745-21-07 | Emissions from this source shall not exceed 3 pounds of organic material in any one hour nor 15 pounds of organic material in any one day. |
| | | | 3745-31-05 | Emissions of organic materials from this source is limited to 0.50 ton per year. |
| R005 Mod | Spray Booth #1 (This modification eliminates a 14 hour per day operation | Compliance with OAC rule 3745-21-07 (G) (2) | 3745-21-07 | Emissions from this source shall not exceed 8 pounds of organic material in any one hour nor 40 |

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|-------------------------------|---|---|---|---|
| R005 Mod cont | limit) | | 3745-31-05 | pounds of organic material in any one day. Combined emissions of organic materials from sources R005, R006, R007, R008, R009, R010, and R011 shall not exceed 15.05 tons per year as a twelve month rolling summation. |
| | | Use of filters on booth exhaust. | 3745-17-11 | This emissions unit is limited to 0.551 pound per hour and 2.4 tons per year of particulate matter emissions. |
| | | Use of filters on booth exhaust. | 3745-17-07 | See Additional Special Term and Condition C. |
| R006 Mod | Spray booth #2 (This modification eliminates a 14 hour per day operation limit) | Compliance with OAC rule 3745-21-07 (G) (2) | 3745-21-07 | Emissions from this source shall not exceed 8 pounds of organic material in any one hour nor 40 pounds of organic material in any one day. |
| | | | 3745-31-05 | Combined emissions of organic materials from sources R005, R006, R007, R008, R009, R010, and R011 shall not exceed 15.05 tons per twelve month |

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|-------------------------------|---|--|---|---|
| R006 Mod cont | | Use of filters on booth exhaust. | 3745-17-11 | rolling summation. This emissions unit is limited to 0.551 pound per hour and 2.4 tons per year of particulate matter emissions. |
| | | Use of filters on booth exhaust. | 3745-17-07 | See Additional Special Term and Condition C. |
| R007 Mod | Spray booth #3 (This modification eliminates a 14 hour per day operation limit and prohibits the use of photochemically reactive materials) | Use of waterbase coatings and turbo spray guns for increased transfer efficiency. | 3745-31-05 | Organic compound emissions from this emissions unit shall not exceed 40 pounds per day. Emissions of organic materials from sources R005, R006, R007, R008, R009, R010, and R011 shall not exceed 51.1 tons per year as a twelve month rolling summation. |
| | | To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07 (G) (2), no photochemically reactive materials (i.e., as coatings or cleanup | 3745-21-07 | This emissions unit is exempt from this rule. |

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|-------------------------------|--|--|---|--|
| R007 Mod cont | | materials) shall be employed in this emissions unit. Note: The definition of "photo-chemically reactive" is based upon OAC rule 3745-21-01 (C) (5). | | |
| | | Use of filter on booth exhaust. | 3745-17-11 | This emissions unit is limited to 0.551 pound per hour and 2.4 tons per year of particulate matter emissions. |
| | | Use of filters on booth exhaust. | 3745-17-07 | See Additional Special Term and Condition C. |
| R008 Mod | Spray booth #4 (This modification eliminates a 14 hour per day operation limit and prohibits the use of photo-chemically reactive materials) | Use of waterbase coatings and turbo spray guns for increased transfer efficiency. | 3745-31-05 | Organic compound emissions from this emissions unit shall not exceed 40 pounds per day. Combined emissions of organic materials from sources R005, R006, R007, R008, R009, R010, and R011 shall not exceed 51.1 tons per year as a twelve month rolling summation. |

| Ohio EPA Source Number | Source Identification Description | BAT Determination | Applicable Federal & OAC Rules | Permit Allowable Mass Emissions and/or Control/Usage Requirements |
|---------------------------------|---|---|--------------------------------------|---|
| R008 Mod cont | | <p>To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07 (G) (2), no photochemically reactive materials (i.e., as coatings or cleanup materials) shall be employed in this emissions unit.</p> <p>Note: The definition of "photochemically reactive" is based upon OAC rule 3745-21-01 (C) (5).</p> | 3745-21-07 | This emissions unit is exempt from this rule. |
| | | Use of filters on booth exhaust. | 3745-17-11 | This emissions unit is limited to 0.551 pound per hour and 2.4 tons per year of particulate matter emissions. |
| | | Use of filters on booth exhaust. | 3745-17-07 | See Additional Special Term and Condition C. |

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|---|---|---|--|
| R009 Mod | Spray booth #5 (This modification eliminates a 14 hour per day operation limit and prohibits the use of photochemically reactive materials) | Use of waterbase coatings and turbo spray guns for increased transfer efficiency. | 3745-31-05 | Organic compound emissions from this emissions unit shall not exceed 40 pounds per day. Combined emissions of organic materials from sources R005, R006, R007, R008, R009, R010, and R011 shall not exceed 51.1 tons per year as a twelve month rolling summation. |
| | | To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07 (G) (2), no photochemically reactive materials (i.e., as coatings or cleanup materials) shall be employed in this emissions unit. | 3745-21-07 | This emissions unit is exempt from this rule. |
| | | Note: The definition of "photochemically reactive" is based upon OAC rule 3745-21-01 (C) (5). | | |

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--|--|---|--|
| R009 Mod cont | | Use of filters on booth exhaust. | 3745-17-11 | This emissions unit is limited to 0.551 pound per hour and 2.4 tons per year of particulate matter emissions. |
| | | Use of filters on booth exhaust. | 3745-17-07 | See Additional Special Term and Condition C. |
| R010 Mod | Spray booth #6 (This modification eliminates a 14 hour per day operation limit and prohibits the use of photo-chemically reactive materials) | Use of water base coatings and turbo spray guns for increased transfer efficiency. | 3745-31-05 | Organic compound emissions from this emissions unit shall not exceed 40 pounds per day. Combined emissions of organic materials from sources R005, R006, R007, R008, R009, R010, and R011 shall not exceed 51.1 tons per year as a twelve month rolling summation. |
| | | To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07 (G) (2), no photochemically reactive materials (i.e., as coatings or cleanup materials) shall be | 3745-21-07 | This emissions unit is exempt from this rule. |

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--|--|---|--|
| R010 Mod cont | | employed in this emissions unit. Note: The definition of "photo-chemically reactive" is based upon OAC rule 3745-21-01 (C) (5). | | |
| | | Use of filters on booth exhaust. | 3745-17-11 | This emissions unit is limited to 0.551 pound per hour and 2.4 tons per year of particulate matter emissions. |
| | | Use of filters on booth exhaust. | 3745-17-07 | See Additional Special Term and Condition C. |
| R011 | Spray booth #7 | Use of waterbase coatings and a robotic arm spray gun for increased transfer efficiency. | 3745-31-05 | Organic compound emissions from this emissions unit shall not exceed 40 pounds per day. Combined emissions of organic materials from sources R005, R006, R007, R008, R009, R010, and R011 shall not exceed 51.1 tons per year as a twelve month rolling summation. |

| Ohio EPA Source Number | Source Identification Description | BAT Determination | Applicable Federal & OAC Rules | Permit Allowable Mass Emissions and/or Control/Usage Requirements |
|---------------------------------|---|---|--------------------------------------|---|
| R011 cont | | <p>To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07 (G) (2), no photochemically reactive materials (i.e., as coatings or cleanup materials) shall be employed in this emissions unit.</p> <p>Note: The definition of "photochemically reactive" is based upon OAC rule 3745-21-01 (C) (5).</p> | 3745-21-07 | This emissions unit is exempt from this rule. |
| | | Use of filters on booth exhaust. | 3745-17-11 | This emissions unit is limited to 0.551 pound per hour and 2.4 tons per year of particulate matter emissions. |
| | | Use of filters on booth exhaust. | 3745-17-07 | See Additional Special Term and Condition C. |

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| VOC | 52.0 |
| Particulate | 16.8 |

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.

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 Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.

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.

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

A. Operational Restrictions

1. The emissions of organic compounds from emissions units R005-R011 shall not exceed 51.1 tons per year, based upon a rolling 12-month summation of the monthly emissions.

B. Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the organic compound emission rate in terms of pounds per month (sum of (b)x(c) for all coatings);
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (for sources R005-R006 and sources P001-P002);
 - f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit were in operation (R005-R006 and P001-P002); and,
 - g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (g)/(h), in pounds per hour (average) (R005-R006 and P001-P002).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitation for organic compounds.

The permittee shall submit deviation (excursion) reports which include the following information:

- a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, (for R005 and R006) or 3 pound per hour, (for P001 and P002) and the actual average hourly organic compound emissions for each such day; and,
- b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, (for R005 and R006) or 15 pounds per day, (for P001 and P002) and the actual organic compound emissions for each such day.

The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous twelve months. These reports shall be submitted by January 31 of each year.

D. Testing and Compliance Requirements

1. Compliance with the 8 pound per hour and/or 40 pound per day emission limit (for R005-R011), the 3 pound per hour and 15 pound per day (for P001 and P002), and the 51.1 ton per year combined plant wide limit shall be determined from the recordkeeping requirements in Section B above.

E. Miscellaneous Requirements

1. Solid, semi-solid or hazardous materials generated by the unit operations are to be reused, recycled or sold for recovery when feasible. Solid, semi-solid and hazardous waste must be stored, treated, or disposed of in facilities installed and operated in accordance with Ohio Revised Code Section 3734.
2. The Southeast District Office of the Ohio Environmental Protection Agency shall be notified, in writing prior to start-up of operations, as to the proposed disposition of all solid, semi-solid and hazardous waste materials. Notification shall include the following information:
 - a. name, location, and address of disposal facility;
 - b. method of disposal (incineration, secure landfill, etc.);

- c. description of waste material to be disposed of;
- d. quantities of waste material to be disposed of and frequency of disposal; and,
- e. name and address of contract haulers.

Any change in the disposition of waste materials shall be reported to the Ohio EPA Southeast District Office prior to such a change.

- 3. Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.
- 4. For purposes of calculating the organic compound emission rates for these emissions units and the associated ovens (P001 or P002), the permittee shall utilize a value of 96.25 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 3.75 percent of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon evaporation curves relating percent solvent losses to solvent flash-off times as illustrated in Figure 665 of AP-40.
- 5. This Permit to Install shall supersede PTI No. 06-3418 issued on June 30, 1992 to The Ohio Plastics Company.