



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
GREENE COUNTY**

CERTIFIED MAIL

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: 08-4072

DATE: October 6, 1999

Ali Industries, Inc.
Stanley D Young
611 Yellow Springs Road
Fairborn, OH 45324-7677

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA
REGIONAL AIR POLLUTION CONTROL AGENCY



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Terms and
Conditions**

Issue Date: October 6, 1999
Effective Date: October 6, 1999

FINAL PERMIT TO INSTALL 08-4072

Application Number: 08-4072
APS Premise Number: 0829060557
Permit Fee: **\$400**
Name of Facility: Ali Industries, Inc.
Person to Contact: Stanley D Young
Address: 611 Yellow Springs Road
Fairborn, OH 45324-7677

Location of proposed air contaminant source(s) [emissions unit(s)]:
747 Xenia Drive
Fairborn, Ohio

Description of proposed emissions unit(s):
ADHESIVE PAPER COATING PROCESS WITH TWO ROLL COATERS AND DIP TANKS AND ONE FLEXOGRAPHIC PRINTER.

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

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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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 recordkeeping 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 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

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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)

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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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.

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	10.14

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>
Adhesive Paper Coating Process, Modification (See Section F.3.)	OAC rule 3745-31-05 (A)(3)	55.44 lbs VOC/day, excluding cleanup; 10.14 TPY VOC, including cleanup
	OAC rule 3745-21-09 (F)	0.11 lb VOC/gal ctg, excluding water and exempt solvents Less stringent than the VOC content limitation above.

2. Additional Terms and Conditions

- 2.a The permittee operates a flexographic printer at the head of the paper coating line operation which is subject to OAC rule 3745-21-09 (Y) and the best available technology provisions of OAC rule 3745-31-05 (A)(3). The inks employed in this printer have a VOC content of 0.002 lb/lb ink, or 0.2 % by weight. The projected maximum annual VOC emissions associated with the flexographic printing have been determined to be 166 lbs (0.083 TPY). This satisfies the BAT requirement. Due to the trivial nature of this printing VOC record keeping and reporting requirements have been determined to not be necessary.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The coating material employed in this emissions unit consists of four individual

components that we are mixed on-site. The four individual components are identified as resin, carbowax, kaolin, and water. The permittee shall collect and record the following information each day for the line:

- a. the name and identification number of each coating component;
 - b. the number of gallons of each of the four components, resin, carbowax, kaolin, and water;
 - c. the total number of gallons mixed, for the combined material;
 - d. the total number of gallons mixed, for the combined material, excluding water and exempt solvents;
 - e. the VOC content, in pounds per gallon, for the combined material, excluding water and exempt solvents;
 - f. the name and identification of each cleanup material applied;
 - g. the number of gallons of each cleanup material applied;
 - h. the VOC content of each cleanup material, in pounds per gallon; and,
 - i. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, i.e., (d) X (e) for the combined material added to the sum of the products of (g) X (h) for each cleanup material.
2. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes 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. where 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 Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports which specify the total number of gallons of coating mixed, the total number of gallons of cleanup materials, and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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Emissions Unit ID: K003

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -
55.44 lbs VOC/day, excluding cleanup materials

Applicable Compliance Method -

Compliance shall be determined through a summation of each coating's maximum hourly usage, 8.69 gallons resin and 10.38 gallons carbowax, excluding water and exempt solvents (15.24 gallons resin and 10.44 gallons carbowax with water), multiplied by each coating's corresponding maximum VOC content, excluding water and exempt solvents, 0.233 lbs/gal and 0.027 lbs/gal and the maximum operating hours per day, 24 hours. (The combined material also includes 2.37 gallons of kaolin and 1.98 gallons of water which do not contain any volatile organic compounds).

- b. Emission Limitation -
10.14 TPY VOC, including cleanup materials

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in Section C.1. and shall be the summation of the 365 daily VOC emission rates for the calendar year.

2. USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted emission unit are subject to public disclosure in accordance with OAC 3745-49-03.
2. The permittee 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 source(s).

3. This is a modification to PTI # 08-3308 which was issued on April 19, 1995 and represents a 1.44 TPY VOC emissions increase.

4. Air Toxic Policy Clarifying Language

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: formaldehyde

STEL (ug/m³): 370

Maximum Hourly Emission Rate (lbs/hr): 0.61

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 5.21

MAGLC (ug/m³): 6.49

Pollutant: methanol

TLV (ug/m³): 262,000

Maximum Hourly Emission Rate (lbs/hr): 1.02

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 8.73

MAGLC (ug/m³): 2,620

Pollutant: diethanolamine

TLV (ug/m³): 2000

Maximum Hourly Emission Rate (lbs/hr): 0.0046

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 0.039

MAGLC (ug/m³): 20

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.)

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the

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application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.