



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

122 S. Front Street

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

Lazarus Gov. Center
P.O. Box 1049

Permit No. 13-3577
RE: PERMIT TO INSTALL REGISTRATION
Terms and Conditions
CUYAHOGA COUNTY
Application No: 13-3577

CERTIFIED MAIL

DATE: August 11, 1999

McGean-Rohco, Inc.
Jintendra Gandhi
2910 Harvard Avenue
Newburgh Heights, OH 44105

Enclosed please find an Ohio EPA Permit to Install Registration which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit registration 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 and Permit Section
Division of Air Pollution Control

cc: CLEVELAND DIVISION OF THE ENVIRONMENT



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY
PERMIT TO INSTALL REGISTRATION

Application Number:

13-3577
APS Premise 1318365229
Number:
Permit Fee: **\$300**
Name of Facility: McGean-Rohco, Inc.
Person to Contact: Jintendra Gandhi
Address: 2910 Harvard Avenue
Newburgh Heights, OH 44105

Location of proposed air contaminant source(s) [emissions unit(s)]:
2910 Harvard Avenue
Newburgh Heights, Ohio

Description of proposed emissions unit(s):
BEAD GRINDER WITH CYCLONE SEPARATOR AND POLYVINYL ACETATE REACTOR UNDER NITROGEN ATMOSPHERE & SEAL POT EMISSION CONTROL.

Date of Issuance: August 11, 1999
Effective Date: August 11, 1999

The above named entity is hereby granted a Permit to Install Registration 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

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 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 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

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August 11, 1999

Facility ID: **1318365229**

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.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM ₁₀	0.300
OC	0.736

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>
Bead grinder with cyclone separator and filter bag to control particulate matter emissions	OAC rule 3745-31-05 (A) (3) OAC rule 3745-17-07	The visible particulate emissions from any exhaust shall not exceed ten per cent (10%) opacity as a six-minute average
	OAC rule 3745-17-11	0.069 pound PM10/hour; 0.30 ton PM10 per year

2. Additional Terms and Conditions

- 2.a None.

B. Operational Restrictions

The pressure drop across the grinder dust collector filter bag shall be maintained at a maximum of ten (10.0) inches of water column while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

The permittee shall properly install, operate and maintain a differential pressure gauge which measures the pressure drop across the filter bag, when the emissions unit is in operation. The differential pressure gauge shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, operating manual(s) with any modifications deemed necessary by the permittee.

The permittee shall record the pressure drop across the filter bag on a daily basis when the emissions unit is in operation.

D. Reporting Requirements

The permittee shall submit annual written deviation (excursion) reports that identify all periods of time during which the pressure drop across the filter bag did not comply with the allowable range specified above and shall include a copy of such records. If no such instances have occurred during a particular year, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

1. The visible emission testing shall be conducted to demonstrate compliance of the emissions unit with the allowable emission rate:

Emission Limitation:

Ten per cent (10%) opacity, as a six-minute average

Applicable Compliance Method:

Visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B) (1) using the methods and procedures in U.S. EPA Reference Method 9, 40 CFR 60, Appendix A.

2. If required, emission testing shall be conducted to demonstrate compliance with the allowable emission limitation of 0.069 pound PM₁₀ per hour, and the testing shall be conducted using USEPA Methods 1 to 5 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None.

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

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>
Polyvinyl acetate bead enclosed reactor under nitrogen atmosphere with water seal pot to control OC emissions	OAC rule 3745-31-05 (A) (3) OAC rule 3745-21-07 (G) (1)	0.168 pound OC (organic compounds) per hour, 4.03 pounds OC per day and 0.736 ton OC per year Rule 3745-21-07 (G) (1) is less restrictive than rule 3745-31-05 (A) (3)

2. Additional Terms and Conditions

2.a None.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

The permittee shall properly install, operate and maintain a water flow rate meter which measures the rate of water flowing into the water seal pot associated with the reactor, when the emissions unit is in operation. The water flow rate monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, operating manual(s) with any modifications deemed necessary by the permittee.

Water flow rate to the water seal pot shall be recorded once within one hour at the start of and

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within one hour before the end of the batch.

D. Reporting Requirements

The permittee shall submit annual written deviation (excursion) reports that identify all periods of time during which no water flows into the water seal pot and a copy of such record. If no such instances have occurred during a particular year, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

None.

F. Miscellaneous Requirements

None.