State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
FRANKLIN COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 01-06087

DATE: 6/26/2001

Franklin International Inc
Michael Desgranges
2020 Bruck St
Columbus, OH 43207

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 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

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

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/26/2001**
Terms and Conditions **Effective Date: 6/26/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-06087

Application Number:	01-06087
APS Premise Number:	0125040070
Permit Fee:	**$0**
Name of Facility:	Franklin International Inc
Person to Contact:	Michael Desgranges
Address:	2020 Bruck St Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
2020 Bruck St
Columbus, **Ohio**

Description of proposed emissions unit(s):
Adhesive mixing process.

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.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

GENERAL PERMIT CONDITIONS

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) 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 AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

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.

Franklin International-Construction Div Facility ID: **0125040070**
PTI Application: 01-06087
Modification Issued: 6/26/2001

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **FRANKLIN INTERNATIONAL-CONSTRUCTION DIV** located in **Franklin** County. The emissions units 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.

Ohio EPA Source Number		Source Identification Description		BAT Determination
P039	P007 P007 Cont'd	1,000 gallon adhesive mixing process (Littleford #2)	Mastic adhesive mixing process (Littleford #4)	Use of conservation vent, condenser, and bag dump station. Compliance with Ohio EPA toxics policy and applicable regulations.
P040		1,000 gallon adhesive mixing process (Littleford #3)		Use of conservation vent, condenser, and bag dump

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
station. Compliance with Ohio EPA toxics policy and applicable regulations.	Applicable Federal & OAC Rules 3745-31-05(A)(3) 3745-21-07(G)(2) 3745-31-03(A)(1)(f)	3745-31-05(A)(3) 3745-21-07(G)(2) 3745-31-03(A)(1)(f)	Permit Allowable Mass Emissions and/or Control/Usage Requirements 8 lbs OC/hr, 40 lbs OC/day, 7.3 tons OC/yr No visible particulate emissions from any stack or outside vent and compliance with Special Terms and Conditions. See Additional Special Terms and Conditions Section 1.c below	7.0 tons OC yr No visible particulate emissions from any stack or outside vent and compliance with Special Terms and Conditions. See Additional Special Terms and Conditions Section 1.c below
Use of condenser and con-ser vation vent. Compliance with Ohio EPA toxics policy and applicable regulations.	3745-31-05(A)(3) 3745-21-07(G)(2) 3745-31-03(A)(1)(f)		8 lbs OC/hr, 40 lbs OC/day, 7.3 tons OC/yr No visible particulate emissions from any stack or outside vent and compliance with Special Terms and Conditions. See Additional Special Terms and Conditions Section 1.c below 7.7 lbs OC/hr, 38.5 lbs OC/day,	

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
OC	21.6 (3.9 ton/year overall increase)

Annual emissions will be reduced by 1.2 tons OC/year for sources P039 and P040 below allowable in PTI 01-4965 and will be increased by 5.1 tons OC/yr for source P007 above allowable in PTI 01-1812 as a result of these modifications.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Central District Office - DAPC, 3232 Alum Creek Drive, P.O. Box 1049, Columbus, Ohio 43216-1049.

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 Central District Office - DAPC, 3232 Alum Creek Drive, P.O. Box 1049, Columbus, Ohio 43216-1049.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. a. **Condenser Operational Restriction**

The peak temperature of the outlet water from the condenser shall not exceed 18 degrees Celsius during charging and mixing in these emission units.

Condenser Monitoring and Record keeping Requirements

The permittee shall operate and maintain a continuous temperature monitor and recorder (CEM) which measures and records the temperature of the outlet water from the condenser when the emissions unit is in operation. Units shall be in degrees Celsius. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 0.5 degree Celsius, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

(1). the temperature CEM record of the outlet water temperature from the condenser during each day of operation; and,

(2). a log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

b. **Condenser Reporting Requirements**

The permittee shall submit temperature deviation (excursion) reports that identify any period of time during which the peak temperature of the outlet cooling water from the condenser exceeded the temperature limitation specified above.

c. **Water-Borne Adhesives**

The condenser control requirements and the temperature monitoring requirements of the CEM shall not be applied to this emissions unit when mixing water-borne adhesives and binders at ambient temperatures.

2. Reporting Requirements Related to Monitoring and Record keeping Requirements

The permittee shall submit reports in the following manner:

a. reports of any required information shall be submitted to the appropriate Ohio EPA District Office or Local Air Agency; and,

b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) 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, (ii) the probable cause of such deviations, and (iii) 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, a quarterly report shall be submitted which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

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 5 years from the date that 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. Emission Testing Requirements

The permittee shall conduct, or have conducted, emission testing for the Littleford #3 emissions unit P039 in accordance with the following requirements:

a. the emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal;

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for OC;

c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 1-4 and 25a for this emission unit; and,

d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or Local Air Agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s).

5. Process Modification Restriction

Prior to employing any material in this emissions unit not identified on the application for this permit or prior to increasing the maximum hourly usage of any material that will result in an increase in emissions, this facility shall notify and obtain approval from the Ohio EPA Central District Office. This notification, at a minimum, shall include an identification of the compound, the proposed hourly maximum usage rate,

and an assessment of the toxic impact using Ohio EPA's toxics policy in effect at the time of the assessment. For reference purposes, the toxic impact is based on the maximum ground level concentration resulting from a screen 3 model of emissions of 1,1,1 trichloroethane at 8 lbs/hr from the Littleford 2 and at 7.7 lbs/hr from the Littleford 4 and of acetone, toluene, and hexane each at 8.0 lbs/hr from Littleford 3.

The assessment required by this term and all supporting documentation shall be submitted to the Ohio Environmental Protection Agency, Central District Office for written approval prior to the use of the material.

6. Preventative Maintenance and Malfunction Abatement Plan

In accordance with OAC 3745-15-06, the existing Inspection and Record keeping Procedure shall be updated to include condenser monitoring and record keeping procedures outlined in the above Special Terms and Conditions. The resulting manual shall be referred to as the PM&MAP and shall include notification provisions as outlined above.

Miscellaneous Requirement

This PTI, 01-06087, supercedes the requirements found in PTI #01-4965, issued 7/27/94, for emission units P039 and P040.