



State of Ohio Environmental Protection Agency

Street Address:

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

Lazarus Gov.
Center

**RE: FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL
FRANKLIN COUNTY
Application No: 01-06009**

DATE: 10/18/2001

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, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/18/2001
Effective Date: 10/18/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-06009

Application Number: **01-06009**
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 modification:
Vinyl acetate and butyl acrylate storage tanks.

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

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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

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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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Franklin International Inc** 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>
			(T005)
	T140	20,000 gallons butyl acrylate storage tank (T006)	
T135		25,000 gallons vinyl acetate storage tank (T001)	Use of submerged fill, conservation vent and vapor balance system
	T141	30,000 gallons 2-ethyl hexyl acrylate storage tank (T007)	
T136		25,000 gallons vinyl acetate storage tank (T002)	Use of submerged fill, conservation vent and vapor balance system
	T142	12,000 gallons methyl methacrylate storage tank (T008)	
T137		25,000 gallons vinyl acetate storage tank (T003)	Use of submerged fill, conservation vent and vapor balance system
	T143	12,000 gallons isobutyl acrylate storage tank (T009)	
T138		25,000 gallons vinyl acetate storage tank (T004)	Use of submerged fill, conservation vent and vapor balance system
T139		20,000 gallons butyl acrylate storage tank	Use of submerged fill, conservation vent and

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<u>EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
vapor balance system	vent and vapor balance system		3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Use of submerged fill, conservation vent and vapor balance system	Use of submerged fill, conservation vent and vapor balance system	Applicable Federal & OAC Rules	3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	0.23 ton OC/yr
vapor balance system		3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	0.23 ton OC/yr
Use of submerged fill, conservation vent and vapor balance system		3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	0.23 ton OC/yr
Use of submerged fill, conservation vent and vapor balance system		3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb	0.01 ton OC/yr
Use of submerged fill, conservation		3745-31-05 3745-21-07 40 CFR, Part 60 Subpart Kb		0.01 ton OC/yr

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<u>Ohio</u> <u>EPA</u> <u>Source</u> <u>Number</u>	<u>Source</u> <u>Identification</u> <u>Number</u>	<u>BAT</u> <u>Determination</u>	<u>Applicable Federal &</u> <u>OAC Rules</u>	<u>Permit Allowable</u> <u>Mass Emissions</u> <u>and/or Control/Usage</u> <u>Requirements</u>
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0.01 ton
OC/yr

0.1 ton
OC/yr

0.1 ton
OC/yr

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	<1.0

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NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR, Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T135	25,000 gallons storage tank	Kb
T136	25,000 gallons storage tank	Kb
T137	25,000 gallons storage tank	Kb
T138	25,000 gallons storage tank	Kb
T139, T140	20,000 gallons storage tank	Kb
T141	30,000 gallons storage tank	Kb
T142, T143	12,000 gallons storage tank	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- construction date (no later than 30 days after such date);
- anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- actual start-up date (within 15 days after such date); and
- date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning

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P.O. Box 1049
Columbus, OH 43216-1049

and OEPA Central District Office - DAPC
3232 Alum Creek Drive
Columbus, Ohio 43207-3417

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.

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 Central District Office - DAPC, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

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.