



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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: 01-05683**

DATE: 8/28/2001

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: 8/28/2001
Effective Date: 8/28/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-05683

Application Number: **01-05683**
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:
Reactor systems.

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

Franklin International Inc
PTI Application: 01-05683
Modification Issued: 8/28/2001

Facility ID: **0125040070**

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

Franklin International Inc
PTI Application: 01-05683
Modification Issued: 8/28/2001

Facility ID: **0125040070**

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.

5

Franklin International Inc
PTI Application: 01-05683
Modification Issued: 8/28/2001

Facility ID: **0125040070**

Franklin International Inc
PTI Application: 01-05683
Modification Issued: 8/28/2001

Facility ID: **0125040070**

<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>
-------------------------------	-------------------------------------	--------------------------	---	--

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 Description</u>	<u>BAT Determination</u>
P106	Reactor 10 System	
P116	Reactor 8 System	Use of condenser/ conservation vent on pre-emulsion tank and reflux condenser on polymerization reactor, compliance with Ohio EPA toxics policy and applicable rules.
P107	Reactor 9 System	Use of condenser/ conservation vent on pre-

Franklin International Inc
PTI Application: 01-05683
Modification Issued: 8/28/2001

Facility ID: **0125040070**

<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>
emulsion tank and reflux condenser on polymerization reactor, compliance with Ohio EPA toxics policy and applicable rules.	and reflux condenser on polymerization reactor, compliance with Ohio EPA toxics policy and applicable rules.	Applicable Federal & OAC Rules	3745-31-05(A)(3)	Permit Allowable Mass Emissions and/or Control/Usage Requirements
			3745-21-07(G)(1)	6.5 lbs OC/hr, 32.3 lbs OC/day, and compliance with Additional Special Terms and Condition #6.
			3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3 lbs/hr and 15 lbs/day unless said discharge has been reduced by at least 85 percent.
Use of condenser/conservation on pre-emulsion tank			3745-21-07(G)(1)	6.5 lbs OC/hr, 32.3 lbs OC/day, and compliance with Additional Special Terms and Condition #6.
				Organic compound (OC) emissions shall not exceed 3 lbs/hr and 15 lbs/day unless said discharge has been reduced by at least 85 percent.

Franklin International Inc
PTI Application: 01-05683
Modification Issued: 8/28/2001

Facility ID: **0125040070**

<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>
-------------------------------	-------------------------------------	--------------------------	---	--

6.5 lbs
OC/hr,
32.3 lbs
OC/day,
and
compliance with
Additional
Special
Terms
and
Condition #6.

Organic
compound (OC)
emissions shall
not
exceed
3 lbs/hr
and 15
lbs/day
unless
said
discharge has
been
reduced
by at
least 85
percent.

Franklin International Inc
 PTI Application: 01-05683
 Modification Issued: 8/28/2001

Facility ID: 0125040070

**SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	17.7 (-7.4)

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, P. O. Box, 163669, Columbus, Ohio 43216-3669.

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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Temperature Restrictions, Monitoring, Recording, and Reporting

The chilled water temperature entering the condenser serving the pre-emulsion tank vent on emission units P106, P107 and P116 shall not exceed 17 degrees C at any time during use of the pre-emulsion tank.

The vapor temperature immediately existing the condenser serving the reactor vent from emission units P106, P107 and P116 shall not exceed 42 degrees C during any hour in which the average vapor temperature was 35 degree C or above.

This facility shall install and maintain temperature monitoring devices to continuously monitor the chilled water temperature entering the pre-emulsion tank vent condenser and the vapor temperature exiting the reactor reflux condenser vent. These devices shall have an accuracy of (+ or -) one percent of the temperature being monitored. The chilled water entering the pre-emulsion tank may be monitored at the point the chilled water enters the building.

This facility shall report any excursions in which the chilled water temperature entering the condenser on the pre-emulsion tank exceeds 17 degrees C and/or the vapor temperature exiting the reactor vent condenser exceeds 42 degrees C during any hour in which the average vapor temperature was 35 degrees C or above.

A quarterly operation temperature report is to be submitted for excursions of condenser operating temperatures as outlined above, to the Ohio EPA, Central District Office. The operating temperature report shall contain as a minimum: the source, the date, the time of occurrence, cause, calculation of the mass of organic compounds released, and action taken to correct and prevent excursions above the condenser operating temperatures. These report shall be submitted by January 31, April 30, July 31, and October 31 of each year to document exceedences for the previous three calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively).

This facility shall prepare a manual outlining procedures for monitoring the pre-emulsion tank condenser and reactor reflux condenser. It shall include an annual preventative maintenance inspection of the conservation vents serving pre-emulsion tank vents. The purpose shall be to insure that the conservation vent is clean and unobstructed and the pressure setting is set at 2 inches of water. This manual shall include a procedure for

record keeping, including any forms, and for reporting malfunctions. This facility shall submit a copy of this manual to the Ohio EPA Central District Office for review and approval within 30 days of the effective date of this permit.

The records required by this term shall be retained in the company's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

2. Visible Emission Limitation

There shall be no visible particulate emission from any stack or outside vent, from the room containing the unit during addition of solids to emission units P106, P107 and P116.

3. Emergency Containment System

This facility shall install and maintain an emergency containment system capable of preventing the release of any liquid or solid material from emissions unit P106, P107 and P116. The purpose of emergency containment is public safety and the design of the emergency containment system shall be adequate to prevent any release of liquids or solids.

4. Process Modification Restriction

An assessment of toxic impact shall be made for any additional reactions emitting air pollutants with a greater combined impact than vinyl acetate emitted at 6.5 lbs/hr from emission units P106, P107, and P116. This assessment shall be made using Ohio's toxics policy which is in place at the time of the assessment. An assessment shall also be made of whether the emergency containment system serving emission units P106, P107, and P116 is adequate to meet the standards set forth above.

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 reaction taking place in emission units P106, P107 and P116.

5. Reserve the Right to Request Testing

The Central District Office reserves the right to have the facility conduct, or have conducted, performance testing of the subject air contaminant sources in accordance with procedures approved by the Agency.

- 6.** If the permittee decides to demonstrate compliance with the BAT limit from OAC rule 3745-31-05(A)(3); rather than the rule, 3745-21-07(G)(1), the condensers shall reduce organic compound emissions by no less than 85%. The reactor and its pre-emulsion tank shall not be operated without the condenser being maintained as required in this permit.