State of Ohio Environmental Protection Agency

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

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
FRANKLIN COUNTY
Application No: 01-05232

DATE: 7/10/2001

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: 7/10/2001**
Terms and Conditions **Effective Date: 7/10/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-05232

Application Number: **01-05232**
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-acrylate polymer reactor.

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.

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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P124	Adhesive Mixing Process Reactor 6 System	Use of chilled water condenser and conservation vent on pre-emulsion kettle at all times during use. Use of a chilled water condenser on the reactor vent at all times during reactor use. An emergency containment system capable of preventing the release of any emissions in excess of Permit Allowable. Compliance with all applicable regulations and Additional Terms and Conditions.	3745-31-05(A)(3)	4.38 lbs OC/hr 21.92 lbs OC/day and compliance with Additional Special Term and Condition #14.
			3745-21-07(G)(1)	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.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

OC	**Tons/Year**
	4.0

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

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 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.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The vapor temperature immediately exiting the condenser serving the reactor vent from emissions unit P124 shall not exceed 42 degrees C during any hour in which the average vapor temperature was 35 degrees C or above.

2. This facility shall install and maintain a temperature monitoring device to continuously monitor and record the exhaust gas temperature immediately exiting the condenser shall have an accuracy of (+ or -) one percent of the temperature being monitored.

3. This facility shall submit quarterly reports of any incidents in which the exhaust gas temperature of the reactor vent condenser exceeds the limits established by special term number 1. The facility shall also submit the cause for each excursion, the actions which have been taken to correct the cause for the excursion and a calculation of the mass of organic compounds released during the hour in which the excursion took place. These reports shall be submitted to the Ohio Environmental Protection Agency, Central District Office.

4. The records of the exhaust gas temperatures from the reactor condenser vent serving emission unit P124 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.

5. The chilled water temperature entering the condenser serving the pre-emulsion tank vent on emissions unit P124 shall not exceed 17 degrees C at any time during use of the pre-emulsion tank.

6. This facility shall install and maintain a temperature monitoring device at the point the chilled water enters the building, to continuously monitor and record the chilled water temperature entering the condenser serving the pre-emulsion tank on emission unit P124. The device shall have an accuracy of (+ or -) one percent of the temperature being monitored.

7. This facility shall submit quarterly reports of any incidents in which the chilled water temperature entering the pre-emulsion vent condenser exceeds the limits established by special term number 5. The facility shall also submit the cause for each excursion, the actions which have been taken to correct the cause for the excursion and a calculation of the mass of organic compounds released during the hour in which the excursion took place. These reports shall be submitted to the Ohio Environmental Protection Agency, Central District Office.

8. This facility shall install and maintain an emergency containment system capable of preventing the release of any liquid or solid material from emissions unit P124. The purpose of the emergency containment system is public safety and the design of the emergency containment system shall be adequate to prevent any release of liquids or solids.

9. This facility shall conduct annual preventative maintenance inspections on the conservation vent serving the P124 pre-emulsion vent, for the purpose of checking that the conservation vent is clean and unobstructed, and the pressure setting is set at 2 inches of water. A record of the items required by this term for these preventative maintenance inspections shall be maintained by this facility.

10. The records required by term #9 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.

11. There shall be no visible emissions from any stack or outside vent, from the room containing the unit during any additions of solids to any section of emissions unit P124.

12. An assessment of toxic impact shall be made for any additional reactions that will result in a toxics impact greater than what was submitted by this facility as worst case for emissions unit P124. 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 emissions unit P124 is adequate to meet the standards set forth in term #8.

13. The assessment required by term #12 and all supporting documentation shall be submitted to the Ohio Environmental Protection Agency, Central District Office for written approval prior to that reaction taking place in emissions unit P124.

14. 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 it's pre-emulsion tank shall not be operated without the condenser being maintained as required in this permit.