



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: 01-06303**

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 01-06303

Application Number: **01-06303**
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 system.

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: 01-06303
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: 01-06303
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: 01-06303
Modification Issued: 8/28/2001

Facility ID: **0125040070**

Franklin International Inc
PTI Application: 01-06303
Modification Issued: 8/28/2001

Facility ID: **0125040070**

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>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P125	Reactor System (R11)	Use of condenser/conservation vent on pre-emulsion tank and reflux condenser on polymerization kettle/compliance with Ohio EPA toxics policy/an emergency release containment system/compliance with all applicable regulations and terms and conditions.	3745-31-05(A)(3) 3745-21-07(G)(1)	7.8 lbs OC/hr 39 lbs OC/day and Compliance with Additional Special Term and Condition #9 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

OC

Pollutant

Franklin International Inc
PTI Application: 01-06303
Modification Issued: 8/28/2001

Facility ID: **0125040070**

Tons/Year

7.1

CONSTRUCTION STATUS

The OEPA Central District Office - DAPC shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: P025.

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, 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.

NINETY DAY OPERATING PERIOD

Franklin International Inc
PTI Application: 01-06303
Modification Issued: 8/28/2001

Facility ID: **0125040070**

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.

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. Reactor Reflux Condenser Monitoring

The vapor temperature immediately exiting the condenser serving the reactor vent from the emission unit, P125, shall not exceed 42°C during any hour in which the average vapor temperature is 35°C or above.

This facility shall operate and maintain a continuous temperature monitor (CEM) and recorder which measures and records the temperature of the exhaust gases serving the reactor vent of emission unit P125 when the emissions unit is in operation. Units shall be in degrees Celsius. The device shall have an accuracy of $\pm 1\%$ of the temperature being monitored. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

2. Pre-emulsion Tank Condenser Monitoring

The temperature of the chilled water entering the condenser serving the pre-emulsion tank vent on emission unit P125 shall not exceed 17°C at any time during operation of the pre-emulsion tank, and may be monitored at the point the chilled water enters the building.

This facility shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the chilled water entering the condenser serving the pre-emulsion tank on emission unit P125 when the emissions unit is in operation. The device shall have an accuracy of $\pm 1\%$ of the temperature being monitored. Units shall be in degrees Celsius. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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 emission unit P125. The design of the emergency containment system shall be adequate to prevent any release of liquids or solids in accordance with good engineering practices.

This facility shall submit a design for the emergency containment system to the Ohio EPA Central District Office for review, within 30 days upon issuance of this permit.

4. Preventative Maintenance and Malfunction Abatement

This facility shall prepare a manual outlining procedures for monitoring condenser operation including record keeping forms. This manual shall include a procedure for recording and reporting malfunctions. An annual preventative maintenance inspection of the conservation vent serving the pre-emulsion vent shall be included. 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 facility shall submit a copy of this manual to the Ohio EPA Central District Office for review, within 30 days upon issuance of this permit.

5. Visible Emission Limitation

There shall be no visible emissions from any stack or outside vent, from the room containing the unit during addition of solids in the emulsion tank to emission unit P125.

6. Process Modification Restriction

A toxic impact assessment shall be made for any additional reactions emitting air pollutants with a greater combined impact than vinyl acetate emitted at 7.8 pounds/hour from emission unit P125. This assessment shall be made using the Ohio air toxics policy which is in place at the time of the assessment.

7. 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. The Director or his representative shall be allowed to witness the tests, examine testing equipment, and acquire data to assure valid representation of the sources emissions and/or control equipment performance.

8. Reporting and Record keeping Requirements

This facility shall maintain the daily CEM records of the peak temperature of vapor exiting the reactor reflux condenser and the peak temperature of the chilled water temperature entering the building prior to the pre-emulsion tank condenser. Any incident in which the vapor temperature exiting the reactor condenser vent exceeds 42°C during any hour in which the average vapor temperature was 35°C or

Franklin International Inc
PTI Application: 01-06303
Modification Issued: 8/28/2001

Facility ID: **0125040070**

above or the chilled water temperature entering the condenser on the pre-emulsion tank exceeds 17°C shall be reported quarterly to the Ohio Environmental Protection Agency, Central District Office. In this quarterly report the facility shall submit the cause of each temperature excursion, the corrective action taken and a calculation detailing the type and amount of each pollutant released during the excursion.

The records required by term number 1 and 2 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 upon verbal or written request.

This facility shall submit an annual report to the Central District Office of the total organic compound emissions for this source. This report shall be for the previous calendar year (January 1 through December 31).

9. 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.