



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 01-06087**

**DATE:** 11/20/2001

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



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: 11/20/2001  
Effective Date: 11/20/2001**

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

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**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.

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### **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.

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**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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>
P039	1,000 gallons adhesive mixing process (Littleford #2)	Use of conservation vent and bag dump station. Compliance with Ohio EPA toxics policy and applicable regulations.	3745-31-05(A)(3) 3745-21-07(G)(2)
P040	1,000 gallons adhesive mixing process (Littleford #3)	Use of conservation vent and bag dump station. Compliance with Ohio EPA toxics policy and applicable regulations.	3745-31-05(A)(3) 3745-21-07(G)(2)
P007	Mastic adhesive mixing process (Littleford #4)	Use of conservation vent. Compliance with Ohio EPA toxics policy and applicable regulations.	3745-31-05(A)(3) 3745-21-07(G)(2)

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Permit Allowable Mass Emissions and/or Control/Usage Requirements  
visible particulate emissions from any stack or outside vent and compliance with Special Terms and Conditions.

7.7 lbs OC/hr,  
38.5 lbs OC/day,  
7.0 tons OC yr

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.

visible particulate emissions from any stack or outside vent and compliance with Special Terms and Conditions.

8 lbs OC/hr,  
40 lbs OC/day,  
7.3 tons OC/yr  
No

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**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	21.6

**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.

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### **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 permittee may demonstrate compliance with the limits above with the use of a condenser. If a condenser is used to demonstrate compliance, it shall be operated and maintained as required below, and the mixer shall not be operated without it.

For those batches in which the condenser is used to demonstrate compliance with the allowable limits above, 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**

For those batches in which the condenser is used to demonstrate compliance with the allowable limits above, 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  $\pm 1$  percent of the temperature being measured or  $\pm 2.8$  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.

For those batches in which the condenser is used to demonstrate compliance with the allowable limits, 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,

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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**

For those batches in which the condenser is used to demonstrate compliance, the permittee shall submit quarterly 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.

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 Ohio EPA Central District Office; 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 Ohio EPA Central District Office. 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**

If additional testing is required, the permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

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

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- b. 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,
- c. 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.

If additional testing is required, the permittee shall submit an "Intent to Test" notification, no later than 30 days prior to the proposed test date(s), to the Ohio EPA Central District Office . 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 Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central District Office 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 Ohio EPA Central District Office 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

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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, and PTI#01-1812, issued 4/13/88 for emission unit P007.

This modification was initiated in order to develop consistent requirements, for the emission units contained in the Title V permit for this facility.