



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: DRAFT PERMIT TO INSTALL MODIFICATION
FRANKLIN COUNTY**

CERTIFIED MAIL

Application No: 01-06885

DATE: 3/21/2002

HFI, Inc.
Larry Barth
2421 McGaw Road
Columbus, OH 43207

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 100** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 01-06885

Application Number: 01-06885
APS Premise Number: 0125102368
Permit Fee: **To be entered upon final issuance**
Name of Facility: HFI, Inc.
Person to Contact: Larry Barth
Address: 2421 McGaw Road
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5795 Greenpointe Road S
Groveport, Ohio**

Description of proposed emissions unit(s):
Spray booths.

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

HFI, Inc.

Facility ID: 0125102368

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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 five years from the date 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. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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

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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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. 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

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3745-77-08(C)(3)(d).

- b. 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..

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	20.3
MEK (HAP)	9.8
PE	0.1

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Emissions Unit ID: R003

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R003 - Adhesive booth number 3 with gas-fired oven (plastic parts)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 16.26 lbs OC/hr, excluding cleanup solvent usage and 20.35 tons per year, including cleanup solvent usage. See sections A.2.a, B.1, B.2 and B.3, below.
		Methyl ethyl ketone (MEK) emissions shall not exceed 8.0 lbs methyl ethyl ketone/hr. See B.1, B.2, and B.3, below.
		Particulate emissions (PE) shall not exceed 0.036 lb PM/hr, and 0.1 ton per year. See section A.2.b, below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See section A.2.a, below.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See section A.2.b, below.
	OAC rule 3745-31-05(D)	

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Emissions Unit ID: **R003**

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MEK emissions shall not exceed 9.8 tons per rolling, 12-month period. See B.1, B.2, and B.3, below.

2. Additional Terms and Conditions

- 2.a** To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

- 2.c** The terms in this permit supercede those identified in PTI 01-6885 issued March 4, 1998.

B. Operational Restrictions

1. The permittee shall not employ more than 615 gallons in booth #3(R003) during any 1 month period.
2. The permittee shall not employ an adhesive with an OC content that exceeds 5.41 lbs OC/gallon and 2.66 lbs methyl ethyl ketone /gallon.
3. The permittee shall not employ more than 2 gallons of methyl ethyl ketone solvent in booth #3 during any monthly period.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for booth 3 (R003) during each day during which adhesives are applied:
 - a. the company identification for each coating employed and whether or not the material is a photochemically reactive material;
 - b. the number of gallons of each coating employed in each booth;

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- c. the OC and hazardous air pollutant (HAP) content of each coating, in pounds per gallon;
- d. the total OC emission rate for all coatings, in pounds per day;
- e. the total number of hours that each booth was in operation; and,
- f. the average hourly OC emission rate in each booth for all coatings, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 2. The permittee shall collect and record the following information during each month for the purpose of determining annual OC emissions:
 - a. the company identification for each cleanup material employed and whether or not the material is a photochemically reactive material;;
 - b. the number of gallons of each cleanup material employed in each booth;
 - c. the OC and HAP content of each cleanup material, in pounds per gallon;
 - d. the total OC and HAP emissions for all cleanup materials, in pounds;
 - e. the total OC and HAP emission rate for all coating, in pounds, by summing the daily emissions from C.1.d. above; and,
 - f. The monthly OC and HAP emission rate for all coatings and cleanup materials, in pounds (i.e., the sum of the figures from items (d) and (e)).
- 3. The permittee shall maintain monthly records of the following information:
 - a. summation of the daily adhesive usage figures for each month;
 - b. summation of the rolling, 12 - month MEK and HAP emission rate; and,
 - c. any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- d. The permit to install for this emissions unit R003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and

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the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 12.9 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11,179

MAGLC (ug/m³): 14,047

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4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

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1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the maximum allowable monthly coating usage levels.

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2. The permittee shall submit quarterly exceedance reports to the Central District Office which document any exceedance of the operating restrictions set forth in terms B.1., B.2. and B.3. for the previous three calendar months (January 1 through March 31, April 1 through June 30, July 1 through September 30, and October 1 through December 31).

The reports shall be submitted by April 15, July 15, October 15, and February 15 of each year and shall provide a summary of the record keeping required by terms C.1., C.2., and C.3. for each reported exceedance.

E. Testing Requirements

1. Compliance with the emission limitation shall be determined in accordance with the following method(s):

- a. Emissions Limitation (Booth 3 R003)

OC emissions shall not exceed 16.26 lbs/hr, excluding cleanup solvent usage

Applicable Compliance Method

Recordkeeping in section C.1.f., above. of adhesive application per day in booth 3 divided by hours of operation.

$$3 \text{ gal/hr} * 5.41 \text{ lbs OC/gal} = 16.2 \text{ lbs OC/hr}$$

- b. Emissions Limitation (Booth 3 R003)

OC emissions shall not exceed 20.35 ton per year, including cleanup solvent usage.

Applicable Compliance Method

Recordkeeping in section C.2.f., above. of adhesive application per day and per rolling, 12-month period plus recordkeeping of methyl ethyl ketone usage per month.

$$(7,350 \text{ gal/yr} * 5.41 \text{ lbs/gal} * 1 \text{ ton}/2,000 \text{ lbs}) + (24 \text{ gal MEK/yr} * 6.7 \text{ lbs OC/gal} * 1 \text{ ton}/2,000 \text{ lbs}) = 20.3 \text{ tons OC/yr}$$

- c. Emissions Limitation (Booth 3 R003)

MEK emissions shall not exceed 8 lbs/hr, excluding cleanup solvent usage.

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Applicable Compliance Method

Recordkeeping in section C.2.f., above.

$$16.2 \text{ lbs OC/hr} * 48\% \text{ MEK/vol} = 8.0 \text{ lbs MEK/hr}$$

d. Emission Limitation (Booth 3 R003)

MEK emissions shall not exceed 9.8 tons per rolling, 12-month period, including cleanup solvent usage.

Applicable Compliance Method

Recordkeeping in section C.3.b., for summation of MEK emissions during rolling, 12-month period.

$$(615 \text{ gal/month} * 2.26 \text{ lbs MEK/gal} * 1 \text{ ton}/2,000 \text{ lbs} * 12 \text{ months/yr}) + (24 \text{ gal MEK/yr} * 6.7 \text{ lbs OC/gal} * 1 \text{ ton}/2,000 \text{ lbs}) = 9.8 \text{ tons MEK/yr}$$

F. Miscellaneous Requirements

None