☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **01-08563**

A. Source Description

GI Plastek, Inc. in Marysville, Ohio has submitted an application for a federally enforceable synthetic minor permit for a new plastic parts coating line with infrared curing oven (K002). The facility is currently operating under a FESOP that was issued September 17, 1998 for several other coating operations at the facility. The FESOP was isssued because the potential to emit for the facility exceeded the Title V trigger for HAPs. The new coating line will replace one of the coating operations currently permitted in the FESOP and the facility is requesting similar terms and conditions for the replacement unit.

B. Facility Emissions and Attainment Status

GI Plastek, Inc. has the potential to emit more than 25 tons per year of total HAPs and more than 10 tons per year of individual HAPs. The FESOP restricted the facility to less than the major thresholds for HAPs. GI Plastek is located in Union County which is considered attainment for all pollutants. For K002, the PTE for total HAPs does not trigger the Title V threshold except when combined with the other units at the facility.

	PTE Pre-Synthetic Minor PTI	PTE Post Synthetic Minor PTI
Total HAPs	17.5 tons/yr	24.9 tons/yr
Individual HAPs	16.1 tons/yr	9.9 tons/yr
OC	46.4 tons/yr	26.5 tons/yr

C. Source Emissions

The coating usage restrictions of the synthetic minor permit effectively limits the facility to 24.9 tons of total HAPs and 9.9 tons of individual HAPs per rolling, 12-month period when combined with the FESOP for the other emissions units. The coating line consists of a spray booth that is controlled by fabric exhaust filters, a flash-off tunnel, and an electric infrared curing oven. The short term hourly emission limitations reflects the emission unit's potential to emit. K002 will be restricted to 6,000 gallons of coating per rolling, 12-month period in order to meet the HAP limitations.

D. Conclusion

GI Plastek, Inc. has requested federally enforceable limitations for their new plastic parts coating line in order to avoid triggering Title V for HAPs. Through use of coating restriction and strict record keeping and reporting, the combined emissions for this unit and other coating operations at the facility are limited to less than 24.9 tons per year of total HAPs and 9.9 tons per year of individual HAPs.

Street Address:
State of Ohio Environmental Protection Agency
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329
Mailing Address:
Lazarus Gov.
Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
UNION COUNTY
Application No: 01-08563
DATE: 4/25/2002

GI Plastek Dec Rite Plant
John Bair
P O Box 270
Marysville, OH 43040

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 may be issued in proposed of 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 a fee of **$200** 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

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

CC: USEPA **CDO**

DRAFT PERMIT TO INSTALL 01-08563

Application Number:	01-08563
APS Premise Number:	0180010107
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	GI Plastek Dec Rite Plant
Person to Contact:	John Bair
Address:	P O Box 270 Marysville, OH 43040

Location of proposed air contaminant source(s) [emissions unit(s)]:
692 Clymer Rd
Marysville, **Ohio**

Description of proposed emissions unit(s):
Coating line no. 2.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

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

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 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 <u>obtained before</u> 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).

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

Pollutant	Tons Per Year
OC	26.5 tpy
Total HAPs	24.9 tpy
Individual HAPs	9.9 tpy

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

A. Applicable Emissions Limitations and/or Control Requirements

1. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-07(G)(2)
K002 - Plastic parts coating line number two including a spray booth vented to exhaust filter pads, flash-off tunnel, and infrared oven	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	

Applicable Emissions Limitations/Control Measures	
Organic compound (OC) emissions shall not exceed 4.1 pounds per hour, excluding cleanup material and 26.5 tons per year including cleanup material. The OC content of any coating employed in K002 shall not exceed 2.5 pounds/gallon. The OC content of any cleanup material employed in K002 shall not exceed 6.5 pounds/gallon. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). Total HAP emissions from R002, R003, R004, R006, K001, and K002 shall not exceed 24.9 tons per rolling, 12-month period. Individual HAP emissions from R002, R003, R004, R006, K001, and K002 shall not exceed 9.9 tons per rolling, 12-month period. See A.2.b below.	

2. Additional Terms and Conditions

2.a The 4.1 pounds of OC per hour limitation for this emissions unit was established to reflect the hourly potential to emit and to show compliance with the Ohio EPA Air Toxics Policy. Therefore, it is not necessary to develop record keeping and/or reporting requirements to

ensure compliance with this limit.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive 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).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry exhaust filters whenever this emissions unit is in operation.

2. The maximum annual coating usage for this emissions unit shall not exceed 6,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons/year)
1	1,500
1-2	2,500
1-3	3,000
1-4	3,500
1-5	4,000
1-6	4,500
1-7	5,000
1-8	5,500
1-9	6,000
1-10	6,000
1-11	6,000
1-12	6,000

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day this coating line is in operation:

   a. the company identification for each coating and cleanup material employed;

   b. the number of gallons of each coating and cleanup material employed;

   c. the organic compound content of each coating and cleanup material, in pounds per gallon;

   d. the total organic compound emission rate for all coatings and cleanup material, in pounds per day;

2. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. the total coating usage for each month, in gallons;

   b. during the first 12 calendar months of operation following the issuance of this permit, the cumulative coating usage for each calendar month; and

   c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage.

3. The permittee shall collect and record the following information for R002, R003, R004, R006, K001, and K002 on a monthly basis:

   a. the name and identification number of each coating, thinner, and cleanup material employed;

   b. the total volume, in gallons, of each coating, thinner, and cleanup material employed;

   c. the individual HAP content of each coating, thinner, and cleanup material employed, in pounds per gallon;

   d. the total HAP emissions from all coatings, thinners, and cleanup materials, in pounds or tons;

   e. the total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in pounds or tons;

   f. the rolling, 12-month summation of the total HAP emissions from all coatings, thinners,

and cleanup materials, in pounds or tons; and

g. the rolling, 12-month summation of the total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed in pounds or ton.

4. The permittee shall maintain daily records that document any time periods when the dry exhaust filters were not in service and the emissions unit was in operation.

5. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

6. The permit to install for this emissions unit (K002) was evaluated based on the actual coating 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 the SCREEN 3.0 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" pollutants:

Pollutant: Ethylene Glycol Monobutyl Ether (coating)
TLV (mg/m3): 276.4
Maximum Hourly Emission Rate (lbs/hr): 3.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 701
MAGLC (ug/m3): 6580

Pollutant: Methyl Ethyl Ketone, MEK (cleanup material)
TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.32
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 61.7
MAGLC (ug/m3): 14,047

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 still 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.).

7. 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

1. In accordance with paragraph A.2.b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports for K002 that include each of the following information:

a. an identification of each day during which the OC content of any coating or cleanup material exceeded the limitation specified in A.1. above; and

b. an identification of all exceedances of the rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.

2. The permittee shall submit annual deviation (excursion) reports which identify all exceedances of the annual OC emission limitation of 26.5 tons per year (summation of records in Section C.1.d. above).

3. The permittee shall also submit annual reports which include the following information:

a. the total HAP emissions from the coatings, thinners, and cleanup materials employed in R002, R003, R004, R006, K001, and K002, in tons, for each month and each rolling, 12-month period; and

b. the total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in R002, R003, R004, R006, K001, and K002, in tons, for each month and each rolling, 12-month period.

4. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry exhaust filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

5. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material was employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission limitation:
OC emissions shall not exceed 4.1 pounds per hour, excluding cleanup material.

Applicable Compliance Method:
Compliance with the hourly OC emission limit may be determined by multiplying the maximum OC content of the coatings (2.46 lb/gal) employed by the maximum usage in one hour (1.67 gallons).

b. Emission limitation:
OC emissions shall not 26.5 tons per year, including cleanup material.

Applicable Compliance Method:
Compliance with the annual the annual OC emission limitation shall be determined by summing the daily emissions recorded in Section C.1.d. above.

c. Emission limitation:
Total HAP emissions from R002, R003, R004, R006, K001, and K002 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:
Compliance with this limitation may be determined through the record keeping required in Section C.3.f. above.

d. Emission limitation:
Individual HAP emissions from R002, R003, R004, R006, K001, and K002 shall not exceed 9.9 tons per rolling, 12-month period.

Applicable Compliance Method:
Compliance with this limitation may be determined through the record keeping required in Section C.3.g. above.

2. The OC content of the coatings and cleanup materials shall be determined according to OAC rule 3745-21-10(B). USEPA Method 24 shall be used to determine the OC contents for coatings. If pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 can not be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

None