



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
UNION 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: 01-08906

Fac ID: 0180010107

DATE: 1/11/2005

GI Plastek Dec Rite Plant
Ricarodo Corona
672 Clymer Road
Marysville, OH 43040

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/11/2005
Effective Date: 1/11/2005**

FINAL PERMIT TO INSTALL 01-08906

Application Number: 01-08906
Facility ID: 0180010107
Permit Fee: **\$200**
Name of Facility: GI Plastek Dec Rite Plant
Person to Contact: Ricarodo Corona
Address: 672 Clymer Road
Marysville, OH 43040

Location of proposed air contaminant source(s) [emissions unit(s)]:

**692 Clymer Rd
Marysville, Ohio**

Description of proposed emissions unit(s):

Plastics parts 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

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

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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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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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>
Total HAPs	24.9
Individual HAPs	9.9
OC	70.70

Applicable Emissions
Limitations/Control
Measures

Organic compound (OC) emissions shall not exceed 11.8 pounds per hour, excluding cleanup material.

The OC content of any coating employed in K002 shall not exceed 5.9 pounds/gallon, as applied.

The OC content of any thinner or cleanup material employed in K002 shall not exceed 6.6 pounds/gallon.

Particulate emissions from coating overspray shall not exceed 3.2 tons per year.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-07(A)(1), 3745-17-11(B), and 3745-21-07(G)(2).

OC emissions from coating, thinner and cleanup material from K001, K002, R002, R003, R004, and R006 combined shall not exceed 70.70 tons per rolling, 12-month period.

Total HAP emissions from

coating, thinner and cleanup material from K001, K002, R002, R003, R004, and R006 shall not exceed 24.9 tons per rolling, 12-month period.

Individual HAP emissions from coating, thinner, and cleanup material from K001, K002, R002, R003, R004, and R006 shall not exceed 9.9 tons per rolling, 12-month period.

See Sections II.B.2 and II.B.3 below.

OC emissions shall not exceed 8 pounds/hour and 40 pounds/day when employing photochemically reactive coatings and cleanup material in this emissions unit.

Visible particulate emissions from the outlet stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Particulate emissions shall not exceed 2.90 pounds/hour, based on Figure II.

2. Additional Terms and Conditions

- 2.a** The 11.8 pounds of OC per hour and 3.2 tons of particulate per year emission limitations for this emissions unit were established to reflect the potential to emit and show compliance with the Ohio EPA's Air Toxics Policy. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.

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 emissions units K001, K002, R002, R003, R004, and R006 shall not exceed 22,622 gallons combined, based upon a rolling, 12-month summation of the coating usage figures. This is an existing emissions units and the permittee has existing coating usage records. Therefore this emissions unit does not need to be limited on a monthly coating usage amount for the first year of operation after issuance of this permit.
3. The maximum annual thinner and clean up material usage for emissions units R002, R003, R004, R006, K001, and K002 shall not exceed 1,200 gallons combined, based upon a rolling, 12-month summation of the coating usage figures. This is an existing emissions units and the permittee has existing thinner and clean up material usage records. Therefore this emissions unit does not need to be limited on a monthly thinner and clean up material usage amount for the first year of operation after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. documentation on whether each coating, thinner, and cleanup material employed is photochemically reactive;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the OC content of each coating, thinner, and cleanup material employed, in pounds/gallon; and

- e. the calculated OC emissions from all coating, thinner, and cleanup materials employed (i.e., (c)x(d) for each respective material).
2. The permittee shall collect and record the following information for K001, K002, R002, R003, R004, and R006 on a monthly basis:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the total number of gallons of each coating, thinner, and cleanup material employed;
 - c. the OC content of each coating, thinner, and cleanup material, as applied, in pounds/gallon;
 - d. the individual HAP* content for each HAP of each coating, thinner, and cleanup material, as applied, in pounds of individual HAP per gallon;
 - e. the total combined HAP content of each coating, thinner, and cleanup material employed, in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from d);
 - f. the number of gallons of each type of thinner and clean up material drummed for shipment offsite;
 - g. the total calculated OC emissions from all coatings, thinner, and cleanup materials employed, in pounds or tons (ie., the sum of all coatings, thinner, and cleanup materials multiplied by the respective OC contents minus the amount of cleanup material shipped off-site);
 - h. the calculated total HAP emissions from all coatings, thinners, and cleanup materials, in pounds or tons;
 - i. the total calculated emissions of each individual HAP from all coatings, thinners, and cleanup materials, in pounds or tons;
 - j. the rolling, 12-month summation of the total coating usage, in gallons;
 - k. the rolling, 12-month summation of the total thinner and cleanup material usage, in gallons;

- l. the rolling, 12-month summation of the total OC emissions from all coatings, thinners and cleanup materials, in pounds or tons;
 - m. the rolling, 12-month summation of the total HAP emissions from all coatings, thinners, and cleanup materials, in pounds or tons (for each HAP the sum of j times d for all coating plus the sum of k times d for all thinners, and cleanup materials); and
 - n. 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 (for each HAP the sum of j times e for all coating plus the sum of k times e for all thinners, and cleanup materials).
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Central District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup material.
3. The permittee shall collect and record the following information each day a photochemically reactive material is employed in this emissions unit:
 - a. the number of gallons of each coating, thinner, and cleanup material employed in this emissions unit;
 - b. the OC content of each coating, thinner, and cleanup material employed in this emissions unit, in pounds/gallon or pounds/pound;
 - c. the calculated total OC emission rate for all coating, thinner, and cleanup material employed in this emissions unit, in pounds per day;
 - d. the total number of hours this emissions unit was in operation; and
 - e. the average hourly OC emission rate from all coating, thinner, and cleanup material employed in this emissions unit (i.e., (c)/(d)), in pounds per hour and pounds per day.
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 permit to install for this emissions unit was evaluated based on actual materials (typically coatings and cleanup materials) and the design parameters of the emission unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New

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Emissions Unit ID: **K002**

Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and 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:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 11.8 (assumes that 100% of emissions are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2477

MAGLC (ug/m³): 4485.8

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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. for the days during which photochemically reactive material was employed in this emissions unit, an identification of each day during which the average hourly OC emissions from coating, thinner, and cleanup material exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive material was employed in this emissions unit, an identification of each day during which the OC emissions from coating, thinner, and cleanup material exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of any monthly record showing OC emissions from coating, thinner, and cleanup material exceeded 70.70 tons of OC per rolling, 12-month period from emission units K001, K002, R002, R003, R004, and R006 combined;
 - d. an identification of any monthly record showing the total usage of coating exceeded 22,622 gallons per rolling, 12-month period from emission units K001, K002, R002, R003, R004, and R006 combined;
 - e. an identification of any monthly record showing the total usage of thinner and cleanup materials exceeded 1,200 gallons per rolling, 12-month period from emission units K001, K002, R002, R003, R004, and R006 combined;

Emissions Unit ID: **K002**

- f. an identification of any monthly record showing individual HAP emissions from coating, thinner, and cleanup material exceeded 9.9 tons of an individual HAP emissions per rolling, 12-month period from emission units K001, K002, R002, R003, R004, and R006 combined;
 - g. an identification of any monthly record showing total HAP emissions from coating, thinner, and cleanup material exceeded 24.9 tons of total HAP emissions per rolling, 12-month period from emission units K001, K002, R002, R003, R004, and R006 combined;
 - h. an identification of any monthly record showing the OC content of any coating employed exceeded 5.9 pounds per gallon; and
 - i. an identification of any monthly record showing the OC content of any thinner or cleanup material employed exceeded 6.6 pounds per gallon.
2. 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.
 3. The permittee shall submit annual reports that specify the total emissions of OC, individual HAPs and total HAPs from emissions units K001, K002, R002, R003, R004, and R006 for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission rate for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
11.8 pounds of OC/hour, excluding thinner and cleanup material

Applicable Compliance Method:
Compliance with the hourly OC emission limit may be determined by multiplying the maximum OC content of the coatings (5.9 lb/gal) employed by the maximum usage in one hour (2.0 gallons).
 - b. Emission Limitation:

70.70 tons of OC emissions per rolling, 12- month period from coating and cleanup material in K001, K002, R002, R003, R004, and R006 combined

Applicable Compliance Method:

Compliance with this limitation may be determined through the record keeping required in Section C.2.1 above.

- c. Emission limitation:
24.9 tons of total HAP emissions per rolling, 12-month period from K001, K002, R002, R003, R004, and R006 combined

Applicable Compliance Method:

Compliance with this limitation may be determined through the record keeping required in Section C.2.m above.

- d. Emission limitation:
9.9 tons of individual HAP emissions per rolling, 12-month period from K001, K002, R002, R003, R004, and R006 combined

Applicable Compliance Method:

Compliance with this limitation may be determined through the record keeping required in Section C.2.n above.

- e. Emission Limitations:
8 pounds/hour and 40 pounds/day when employing photochemically reactive coatings, thinners, and/or cleanup material

Applicable Compliance Method:

Compliance with this limitation may be determined through the record keeping required in Sections C.3.c and C.3.e above.

- f. Usage Limitations:
22,622 gallons of coating per rolling, 12-month period
1,200 gallons of thinner and cleanup material per rolling, 12-month period

Applicable Compliance Method:

Compliance with this limitation may be determined through the record keeping required in Sections C.2.j and C.2.k above.

- g. Emission Limitation:
Visible particulate emissions from the outlet stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- h. Emission Limitation:
Particulate emissions shall not exceed 2.90 pounds/hour

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Emissions Unit ID: K002

Applicable Compliance Method:

Compliance with the hourly particulate limit may be determined by multiplying the maximum density of the coating material employed (11.27 lb/gal) by the solids content (54 % by weight) and the maximum usage in one hour (2 gallons). The result shall be multiplied by the estimated transfer efficiency of 40% (i.e., 1-0.4) and the control efficiency rate of the dry filtration of 90% (1-0.9).

- i. **Emission Limitation:**
Particulate emissions from coating overspray shall not exceed 3.2 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate limitation may be determined by multiplying the maximum hourly particulate emission rate determined in II.E.1.h above by the maximum hours in a year (8760) and dividing by 2,000 pounds/ton.

F. Miscellaneous Requirements

None