



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
ASHTABULA 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: 02-14792**

**DATE: 7/17/2001**

Plasticolors, Inc  
Edward Trenn  
PO Box 816  
Ashtabula, OH 440050816

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  
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

NEDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 7/17/2001  
Effective Date: 7/17/2001**

**FINAL PERMIT TO INSTALL 02-14792**

Application Number: 02-14792  
APS Premise Number: 0204010285  
Permit Fee: **\$200**  
Name of Facility: Plasticolors, Inc  
Person to Contact: Edward Trenn  
Address: PO Box 816  
Ashtabula, OH 440050816

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2600 Michigan Ave  
Ashtabula, Ohio**

Description of proposed emissions unit(s):  
**2 High Shear Mixers.**

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

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**Issued: 7/17/2001**

**Facility ID: 0204010285**

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 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**

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 thirty (30) 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>
Organic Compounds	7.3
Particulates	1.5

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - Production line consisting of Mixer 20, Mixer 22, Basket Mill 001, Mix tank 32, Mix tank 33, Mix tank 31 and Filling station, connected to an existing dust collector (filter cartridge) identified as DC007.	OAC rule 3745-31-05(A)(3)	Organic Compounds: 8 lbs/hr, 40 lbs/day, 7.3 tons/year  Particulates: 0.34 lb/hr, 1.5 tons/year  Visible Emissions: Shall not exceed 20% opacity as a 6-minute average.  See Section A.2.a  See Section A.2.b
	OAC rule 3745-21-07(G)(2)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
	Ohio Air Toxics Policy	None

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**Plastic**

**PTI A**

**Issued: 7/17/2001**

Emissions Unit ID: **P028**

## **2. Additional Terms and Conditions**

- 2.a** Permittee shall provide a lid over the mixing tanks at all times, except during short durations of time where employing a lid would be impractical. However, permittee will provide a lid over the mixing tanks at all times during mixing and milling operations, regardless of length of operation. This requirement shall not apply if the lid is broken or inoperable, and if the permittee complies with requirements of OAC rule 3745-15-06.
- 2.b** Cleaning rags saturated with cleaning solvents shall be stored in a closed container when not in use.

## **B. Operational Restrictions**

1. A dust control device with an efficiency of at least 99 percent shall be employed to control particulate matter emissions.
2. The pressure drop across the filter cartridge (DC007) shall be maintained between 3 to 10 inches of water while the production line is in operation.

## **C. Monitoring and/or Recordkeeping Requirements**

1. Permittee shall collect and record the following information for each day the emissions unit P028 is in operation.
  - a. The identification and quantity (pounds and/or gallons) of each compound added to, and/or transferred between, one or more of the units of this production line.
  - b. The duration of each mixing or milling event.
2. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the filter cartridge (DC007) while P028 is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a monthly basis.
3. The permit to install for this emissions unit (P028) was evaluated based on the actual materials (typically coatings and clean-up 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 table summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Toluene

TLV: 188.4 mg/m<sup>3</sup> or 188,400 ug/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level  
 Concentration: 225.1 ug/m<sup>3</sup>

MAGLC = (TLV/42): 4,485.7 ug/m<sup>3</sup>

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 the 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(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.

5. 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 pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the filter cartridge (DC007) did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information for P028:
  - a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions exceeded 40 pounds, and the actual daily organic compound emission for each such day.
3. The permittee shall submit annual reports which specify the total organic compound emissions from P028 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Emissions Limitation:  
Organic compounds: 8 lbs/hr

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Section C.1 of these terms and conditions. The appropriate models/equations found in "Preferred Methods For Estimating Air

Emissions From Paint And Ink Manufacturing Facilities - revised final August 2000" shall be used to determine the organic compound emissions for each day. The hourly organic compound emissions rate shall be determined by dividing the actual daily emissions by the number of operating hours.

2. Emissions Limitation:  
Organic compounds: 40 lbs/day

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Section C.1 of these terms and conditions. The appropriate models/equations found in "Preferred Methods For Estimating Air Emissions From Paint And Ink Manufacturing Facilities - revised final August 2000" shall be used to determine the organic compound emissions for each day.

3. Emissions Limitation:  
Organic Compounds: 7.3 tons/year

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Section C.1 of these terms and conditions. The appropriate models/equations found in "Preferred Methods For Estimating Air Emissions From Paint And Ink Manufacturing Facilities - revised final August 2000" shall be used to determine the organic compound emissions for each day. The annual organic compound emissions shall be determined by adding each of the actual daily organic compound emission rate for each day during the calendar year.

4. Emissions Limitation:  
Particulates: 0.34 lbs/day

Applicable Compliance Method:

USEPA Reference Method 5, if required by the Ohio EPA.

5. Emission Limitation:  
Particulates: 1.5 tons/year

Applicable Compliance Method:

To determine the annual emissions rate for particulate matter, the following equation shall be used:

$$E = (EF \times \text{Annual production rate} \times \text{percent of solids} \times (1-CE))/2000 \text{ lbs/ton}$$

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-14792

Facility ID: 0204010285

FACILITY NAME Plasticolors, Inc

FACILITY DESCRIPTION	Production Line consisting of 7 stations, or equipment units.	CITY/TWP	Ashtabula
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Emissions Unit ID: **P028**

Where;

E = Particulate matter emissions rate, in tons per year

EF = Emission factor, which is 1% as taken from AP-42, 6.4.1 paragraph 3 and Table 6.4-1.

Annual production rate = Annual amount of material processed, in tons per year.

Percent of solids = Percent of dry solids. e.g., CAB chips, that comprise the total amount of material processed.

CE = Control efficiency of the dust collector, which should be 99%.

## 6. Emissions Limitation:

Visible Emissions shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

USEPA Reference Method 9, if required by the Ohio EPA.

**F. Miscellaneous Requirements**

None

SIC CODE 2851 SCC CODE 3-01-014-01 EMISSIONS UNIT ID P028

EMISSIONS UNIT DESCRIPTION Production line consisting of Mixer 20, Mixer 22, Basket Mill 001, Mix tank 32, Mix tank 33, Mix tank 31 and Filling station, connected to an existing dust collector identified as DC007.

DATE INSTALLED July 31, 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.34 lb/hr	1.5	0.34 lb/hr	1.5
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds		8 lbs/hr, 40 lbs/day	7.3	8 lbs/hr, 40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					



**NEW SOURCE REVIEW FORM B**

PTI Number: 02-14792 Facility ID: 0204010285

FACILITY NAME Plasticolors, Inc

FACILITY DESCRIPTION Production Line consisting of 7 stations, or equipment units. CITY/TWP Ashtabula

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)	
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS	
<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Compounds	7.3

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-14792

Facility ID: 0204010285

FACILITY NAME Plasticolors, Inc

FACILITY DESCRIPTION Production Line consisting of 7 stations, or equipment units. CITY/TWP Ashtabula

Particulates

1.5