OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Franklin County
Application No: 01-6674
TOXIC REVIEW

CERTIFIED MAIL

July 2, 1997

CORE MATERIALS CORP.
MADHU VENKATACHALAM
800 MANOR PARK DRIVE
COLUMBUS, OH 43228

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 Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: US EPA
CENTRAL DISTRICT OFFICE, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 01-6674
APS Premise No. 0125041046
Permit Fee: $400.00

Name of Facility: CORE MATERIALS CORP.

Person to Contact: MADHU VENKATACHALAM

Address: 800 MANOR PARK DRIVE
COLUMBUS, OH 43228

Location of proposed source(s): 800 MANOR PARK DRIVE
COLUMBUS, OHIO

Description of proposed source(s):
BATCH PAINT BOOTH AND BATCH PAINT BOOTH OVEN.

Date of Issuance: July 2, 1997

Effective Date: July 2, 1997

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for CORE MATERIALS CORP. located in Franklin County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
R006	Batch paint booth	Compliance with 3745-21-07 (G)(2)	3745-31-05 3745-21-07 (G)(2)	8 lbs OC/hr 40 lbs OC/day
P048	Batch paint booth oven	Compliance with 3745-21-07 (G)(1)	3745-31-05 3745-21-07 (G)(1)	3 lbs OC/hr 15 lbs OC/day

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
OC	10.04

CONSTRUCTION STATUS

The OEPA Central District Office - DAPC shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: R006 and P048.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Central District Office - DAPC, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Recordkeeping Requirement for R006

1. The permittee shall collect and record the following information for each day for the coating:

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

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

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

d. the total organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day;

e. the total (prior to applying the booth/oven "split") daily organic compound emission rate for all coatings, in pounds per day;

f. the total daily organic compound emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition C of this permit), in pounds per day;

g. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (i.e., the sum of the figures from items (d) and (f);

h. the total number of hours the emissions unit was in operation; and,

i. the average hourly organic compound emission rate for the coatings and photochemically reactive cleanup materials, i.e., (g)/(h), 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. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

B. <u>Recordkeeping Requirements for P048</u>

1. The permittee shall collect and record the following information for each day for the oven:

a. the total (prior to applying the booth/oven "split") uncontrolled daily organic compound emission rate for all coatings employed in the coating operation associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition 4 of this permit), in pounds per day;

b. the total number of hours this emission unit was in operation. (This number should be the same as the number of hours the associated coating operation was in operation.); and,

c. the average hourly organic compound emission rate, i.e., (a)/(b), in pounds per hour (average).

C. **Description of the "split" of uncontrolled organic compound emissions between a spray booth and associated oven for R006**

1. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P048), the permittee shall utilize a value of 85 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 15 percent of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon an earlier stack test at the main booth-oven setup.

D. **Description of the "split" of uncontrolled organic compound emissions between a spray booth and associated oven for P048**

1. For purposes of calculating the organic compound emission rates for this emissions unit and the associated spray booth (R006), the permittee shall utilize a value of 85 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 15 percent of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of organic compound emissions between this emissions unit and the associated spray booth is based upon an earlier stack test at the main booth-oven setup.

E. **Reporting Requirements for R006**

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded

40 pounds per day, and the actual organic compound emissions for each such day.

F. **Reporting Requirement for P048**

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. an identification of each day during which the average hourly organic compound emissions exceeded 3 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

   b. an identification of each day during which the organic compound emissions exceeded 15 pounds per day, and the actual organic compound emissions for each such day.

G. **Compliance Methods**

1. Emission Limitation for R006-
   8 lbs OC/hr

   Applicable Compliance Method-
   Compliance shall be demonstrated by the recordkeeping requirements in Section A.1.i.

2. Emission Limitation for R006-
   40 lbs OC/day

   Applicable Compliance Method-
   Compliance shall be demonstrated by the recordkeeping requirements in Section A.1.g.

3. Emission Limitation for P048-
   3 lbs OC/hr

   Applicable Compliance Method-
   Compliance shall be demonstrated by the recordkeeping requirements in Section B.2.c.

4. Emission Limitation for P048-
   15 lbs OC/day

   Applicable Compliance Method-
   Compliance shall be demonstrated by the recordkeeping requirements in Section B.2.a.