State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
LORAIN COUNTY

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: 02-19858
Fac ID: 0247021007
DATE: 10/21/2004

Freeman Manufacturing and Supply Co.
George Wise
1101 Moore Rd.
Avon, OH 440111011

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

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

CC: USEPA **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install		**Issue Date:**	**10/21/2004**
Terms and Conditions		**Effective Date:**	**10/21/2004**

FINAL PERMIT TO INSTALL 02-19858

Application Number:	02-19858
Facility ID:	0247021007
Permit Fee:	**$400**
Name of Facility:	Freeman Manufacturing and Supply Co.
Person to Contact:	George Wise
Address:	1101 Moore Rd. Avon, OH 440111011

Location of proposed air contaminant source(s) [emissions unit(s)]:
1101 Moore Rd.
Avon, **Ohio**

Description of proposed emissions unit(s):
2 Urethane mixing tanks.

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

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.

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
PE	1.31
OC	16.0

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	Applicable Emissions Limitations/Control Measures
P001 - Two 400 gallon urethane mixing tanks	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.30 lbs/hr and 1.31 TPY. Organic compounds (OC) shall not exceed 3.65 lbs/hr and 16.0 TPY. Visible particulate emissions (PE) shall not exceed 5% opacity as a 6-minute average, except as specified by rule.
	OAC 3745-17-07(A)	Less stringent than OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	Less stringent than OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall vent the particulate emissions from the mix tanks to the baghouse controlling this emissions unit.

B. Operational Restrictions

1. The permittee shall operate the baghouse whenever the emissions unit is in operation.

2. The pressure drop across the baghouse shall be maintained within the manufacturer's

recommended range of 1.5" to 4.5" inches of water while the emissions unit is in operation.

3. The baghouse shall be operated with a sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.

4. The permittee shall employ covers during mixing operation to reduce emission losses.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. The company identification of each urethane mix product compound employed.

   b. The number of pounds of each urethane mix product compound employed, including solvents and fillers.

   c. The actual number of hours the emissions unit was in operation.

   d. The amount of solvent used in units of gal/hr.

   e. The density of each solvent in units of lbs/gal.

   f. The average hourly PE emissions rate for all materials employed, i.e., pounds of filler material employed multiplied by the emission factor 20 lbs/ton and divided by actual hours of operation; in pounds per hour (average). See E.1.

   g. The average hourly OC emissions rate for all materials employed, i.e., pounds of solvent material employed divided by actual hours of operation; in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range established in the operational restrictions above.

b. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that the average daily OC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

c. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack or fugitive egress point(s) serving this emissions unit and (b) describe any corrective action(s) taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month period.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Particulate emissions (PE) shall not exceed 0.30 lbs/hr and 1.31 TPY.

Applicable Compliance Method: Compliance shall be based on an emission factors from AP-42, Table 6.4.1 (1/95 update) for "UNCONTROLLED EMISSION FACTORS FOR PAINT AND VARNISH MANUFACTURING."

E(PE)solids lbs/hr = 20 lbs/ton (filler) x lbs/hr filler x 1 ton/2000 lbs x capture efficiency

where capture efficiency is estimated at 90% or (1-.90 for formula)
20 lbs/ton from AP-42, Table 6.4.1

tons per year is determined by multiplying E(PE) in lbs/hr by hours of operation per year and dividing by 2000 lbs/ton.

b. Organic compounds (OC) shall not exceed 3.65 lbs/hr and 16.0 TPY.

Applicable Compliance Method: Compliance shall be based on an emission factors from AP-42 AP-42, Table 6.4.1 (1/95 update) for "UNCONTROLLED EMISSION FACTORS FOR PAINT AND VARNISH MANUFACTURING."

E(OC) lbs/hr = 30 lbs/ton x lbs/hr OC x 1 ton/2000 lbs

where lbs/hr OC = gal/hr (solvent) x solvent density (lbs/gal)

tons per year is determined by multiplying E(OC) in lbs/hr by hours of operation per year and dividing by 2000 lbs/ton.

c. Visible particulate emissions (PE) shall not exceed 5% opacity as a 6-minute average, except as specified by rule.

Applicable Compliance Method: Compliance with the allowable visible emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures outlined in OAC rule 3745-17-03.

F. Miscellaneous Requirements

None