



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL**

**WAYNE COUNTY**

**Application No: 02-22838**

**Fac ID: 0285010376**

**DATE: 12/20/2007**

Refcotec, Inc.  
Timothy Sheehan  
542 Collins Blvd.  
Orrville, OH 44667

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

NEDO



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Permit To Install  
Terms and Conditions

Issue Date: 12/20/2007  
Effective Date: 12/20/2007

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**FINAL PERMIT TO INSTALL 02-22838**

Application Number: 02-22838  
Facility ID: 0285010376  
Permit Fee: **\$1000**  
Name of Facility: Refcotec, Inc.  
Person to Contact: Timothy Sheehan  
Address: 542 Collins Blvd.  
Orrville, OH 44667

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**542 Collins Blvd.**  
**Orrville, Ohio**

Description of proposed emissions unit(s):  
**Modification to the applicable rules for 6 mixers and one new mixer.**

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

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Chris Korleski  
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 (i.e., postmarked) quarterly 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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.58
VOC	9.80
Each air toxic contaminant	0.98

**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 - (P002) - A 12,000 lbs mixing line, mixer No. 7, including two 750-gallon batch tanks, used alternatively. Emissions are controlled by two parallel cartridge collectors.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>There shall be no visible particulate emissions generated from any stacks associated with this emissions unit.</p> <p>Particulate emissions generated by operating this emissions unit shall not exceed 0.36 pounds per hour and 1.58 tons per year.</p>
OAC rule 3745-31-02 (A)	See section A. 2.a of these terms and conditions.
OAC rule 3745-17-07 (A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- 2.a Permit to Install 02-22838 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3):
  - i. Volatile organic compound (VOC) emissions shall not exceed 9.8 tons per year, based upon a rolling 12-month summation of the monthly emissions; and
  - ii. Emissions for each air toxic contaminant, which listed in OAC 3745-114-01, shall not exceed 0.98 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

**B. Operational Restrictions**

1. To ensure enforceability of the annual VOC emission limitation during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the monthly emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC Emissions (tons)
1	1.0
1-2	2.0
1-3	3.0
1-4	4.0
1-5	5.0
1-6	6.0
1-7	7.0
1-8	8.0
1-9	9.0
1-10	9.8
1-11	9.8
1-12	9.8

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

2. To ensure enforceability of the annual each air toxic contaminant emission limitation during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the monthly emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Each Air Toxic Contaminant Emissions (tons)
1	0.10
1-2	0.20
1-3	0.30
1-5	0.50
1-6	0.60
1-7	0.70
1-8	0.80
1-9	0.90
1-10	0.98
1-11	0.98
1-12	0.98

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual each air toxic contaminant emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure differential for each cartridge collector while this emissions unit is in operation. The pressure differential shall be used for each cartridge collector's automatic recycle programming, as well as an indication of cartridge replacement. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. Permittee shall keep a record of cartridge replacement for each cartridge collector.

2. The permittee shall keep the following information for this emissions unit each month:

a. Name of each solvent applied.

b. Whether the solvent is volatile organic compound (VOC) and whether the solvent is an air toxic contaminant.

c. The total weight of all VOC solvent applied, defined as "VS", in tons per month.

d. The total weight of each air toxic contaminant applied, defined as "TS", in tons per month.

e. The total weight of all VOC solvents excluding methanol applied, in tons per month, defined as "TSO" and calculated as follow:

$$TSO = VS - TM$$

Where,

TM = The total weight of methanol as applied, in tons per month.

f. The VOC emissions from this emissions unit, in tons per month, defined as "VOC" and calculated as follows:

$$VOC = (2.4\%)(TM) + (0.6\%)(TSO)$$

Where,

2.4% = percentage loss of methanol, determined by Raoult's Law and experiments performed in August 2007; and

0.6% = percentage loss of VOC solvent, excluding methanol, determined by Raoult's Law and experiments performed in August 2007.

g. Each air toxic contaminant emissions from this emissions unit, in tons per month, defined as "ATP" and calculated as follows:

$$ATP = (TS)(PL)$$

Where,

PL = percentage loss of each air toxic solvent, which was determined by Raults' Law and experiments performed in August 2007. 2.4% for methanol and 0.6% for other air toxic pollutant.

- h. Permittee shall perform an evaluation for each solvent, except isopropanol, heptane, naphtha, methanol toluene, and acetone (which have been evaluated in August 2007), to determine the percentage loss before using in this emissions unit.
3. The permittee shall keep the following information each month for emissions units:
    - a. The monthly VOC emissions, in tons per month;
    - b. The rolling, 12-month summation of the total VOC emissions, in tons;
    - c. The monthly emissions for each air toxic contaminant, in tons per month; and
    - d. The rolling, 12-month summation of each air toxic contaminant emissions, in tons.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. An identification of each month during which the VOC emissions from this emissions unit, for the first 12-month after issuance of this permit, exceeded the rolling, monthly VOC emission limitations in section B.1 of these terms and conditions, and the actual VOC emissions for each such month.
  - b. An identification of each month during which each air toxic contaminant emissions from this emissions unit, for the first 12-month after issuance of this permit, exceeded the rolling, monthly air toxic contaminant emission limitations in section B.2 of these terms and conditions, and the actual air toxic contaminant emissions for each such month
  - c. An identification of each month during which the VOC emissions from this emissions unit exceeded 9.80 tons per year, based upon a rolling 12-month summation of the monthly emissions, and the actual rolling 12-month VOC emissions for each such month.
  - d. An identification of each month during which each air toxic contaminant emissions from this emissions unit exceeded 0.98 tons per year, based upon a rolling 12-month summation of the monthly emissions, and the actual rolling 12-month each air toxic contaminant emissions for each such month.

2. All deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

## E. Testing Requirements

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

- a. Emission Limitation:

No visible particulate emissions from any stacks associated with this emissions unit

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the test methods and procedures specified in US EPA Reference Method 9.

- b. Emission Limitation:

0.36 pounds per hour of particulate emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the following:

$$PE = (1 - CE)(WRs)(0.8\%)(60 \text{ minute})/(90 \text{ minute})$$

Where,

PE = particulate emission rate, in pounds per hour;

CE = control efficiency for the baghouses which are used to control particulate emissions generated from this emissions unit, which is 99.3%, determined by best engineering analysis by the facility;

WRS = maximum weight rate of solids will be used in one batch, which is 9,600 pound per batch, provided by the facility;

0.8% = percentage loss of solid during the mixing, provided by the facility; and

90 minute = one batch time, including minimum cycle time and minimum time between cycles.

If required by Ohio EPA, permittee shall conduct a stack test to demonstrate compliance based upon test methods and procedures in Method 5 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation:

1.58 tons per year of particulate emissions

Applicable Compliance Method:

The tons per year limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8,760 hours per year, and dividing

by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- d. Emission Limitation:  
9.80 tons VOC per year, based upon a rolling, 12-month summation for this emissions unit

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section C.3 of these terms and conditions.

- e. Emission Limitation:  
0.98 ton per year of each air toxic contaminant emissions, based upon a rolling, 12-month summation for this emissions unit

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section C.3 of these terms and conditions.

## F. Miscellaneous Requirements

1. Permittee voluntarily restricts each toxic air contaminant, which listed in OAC 3745-114-01, to be less than 1.0 ton per year. Therefore, modeling to demonstrate compliance with the Ohio EPA's "Toxic Contaminant Statute", ORC 3704.03 was not necessary. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any air toxic contaminant that is listed in OAC 3745-114-01 to increase to above 1.0 ton per year must apply for and obtain a new permit to install.

Refcotec, Inc.

PTI Application: 02-22838

Issued: 12/20/2007

Facility ID:

0285010376

SIC 3297 SCC CODE 4-02-999-98 EMISSIONS UNIT P002  
 CODE \_\_\_\_\_ ID \_\_\_\_\_

EMISSIONS UNIT DESCRIPTION A 12,000-lb. high-speed disperser, mixer No. 7, including two 750-gallon batch tanks. Emissions are controlled by baghouses.

DATE INSTALLED 12/2007

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	Attainment	0.36 lb/hr	1.58	0.36 lb/hr	1.58
PM <sub>10</sub>					
Sulfur Dioxide					
Volatile Organic Compounds	Attainment		9.8 tons/yr		9.8 tons/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					< 0.98 ton/yr of each air toxic pollutant

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination:** (1) No VE; and (2) 0.36 lb/hr and 1.58 tons/yr of particulate emissions. The basis for the determination is the knowledge of process, engineering analysis, and regulations governing this emissions unit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

### TOXIC AIR CONTAMINANTS

**Refcotec, Inc.**

**PTI Application: 02-22838**

**Issued: 12/20/2007**

**Facility ID:**

**0285010376**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES  X  NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_