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Facility Name: **Lancaster Plastics Corporation**

Application Number: **01-7440**

Date: **September 30, 1998**

GENERAL PERMIT CONDITIONS

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

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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

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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.

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|-------------------------------------|--------------------------|---|--|
|-------------------------------|-------------------------------------|--------------------------|---|--|

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Lancaster Plastics Corporation** located in **Fairfield** County. The emissions units 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.

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | |
|-------------------------------|--|--|
| R002 | | Robotic paint booth #2 for plastic lens clear coat |
| R001 | Robotic paint booth #1 for plastic lens clear coat | |
| R002 (Cont) | | |

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--|---|---|--|
| | BAT <u>Determination</u> | with permitted emission limits and applicable rules; Compliance with Ohio's Air Toxics Policy; Use of non-photochemically reactive materials only | | |
| | Compliance with permitted emission limits and applicable rules; Compliance with Ohio's Air Toxics Policy; Use of non-photochemically reactive materials only | | | |

Compliance

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|---|---|------------------------------|---|--|
|---|---|------------------------------|---|--|

Applicable
Federal &
OAC Rules

3745-31-05;
3745-21-07;

3745-17-11;

3745-17-07

3745-17-11;

3745-17-07

3745-31-05;
3745-21-07;

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--|---|---|--|
| | Permit Allowable Mass Emissions and/or Control/Usage Requirements | not exceed 20% as a six-minute average, except as provided by rule | | |
| | 4.76 lbs OC/hr; 18.89 ton OC/yr; Maximum coating OC content 4.45 lbs/gal; Maximum clean-up material OC content 6.94 lbs/gal; Maximum clean-up material usage 248 gallons/yr; Maximum coating usage 8094 gallons/yr; | 4.76 lbs OC/hr; 18.89 tons OC/yr; Maximum coating OC content 4.45 lbs/gal; Maximum clean-up material OC content 6.94 lbs/gal; Maximum clean-up material usage 248 gallons/yr; Maximum coating usage 8094 gallons/yr; | | |
| | 0.003 lb PM/hr; 0.012 ton (23.8 lbs) PM/yr; | 0.003 lb PM/hr; 0.012 ton (23.8 lbs) PM/yr; | | |
| | Opacity shall | Opacity shall not exceed 20% as a six-minute average, except as provided by rule | | |

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| OC | 37.78 |
| PM | 0.024 |

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

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

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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 **Ohio EPA Central District Office, 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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall ensure that all polyester filters, baghouse dust collectors, and baffles are in place and operating correctly at all times that the emissions units are in use.

B. RecordKeeping Requirements

1. The permittee shall collect and record the following information each month for each line for the purpose of determining VOC emissions:
 - a. the name and identification number of each coating and clean-up material, as applied;
 - b. the VOC content of each coating and clean-up material in pounds per gallon (excluding water and exempt solvents), as applied (see D.2.d below);

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- c. the number of gallons of each coating and clean-up material used; and,
 - d. the total VOC emissions from all coatings and clean-up materials employed, in pounds or tons. (See D.2.b.ii below).
2. The permittee shall record, on an annual basis, the sum of all monthly coating usages for each booth (B.1.c above).

C. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any record showing an exceedance of the annual VOC limitations or gallon usage limitations. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) by January 31 of the year following the exceedance.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days following the end of the calendar month.

D. Compliance Determination

Compliance with the emissions limitations of these terms and conditions shall be determined in accordance with the following method(s):

1. Emissions Limitations:
 - a. use of no more than 8094 gallons of coating per year;
 - b. 18.89 tons OC per year;
 - c. 4.76 pounds OC per hour;
 - d. maximum OC content 4.45 pounds per gallon, "as-applied";
 - e. 0.012 ton PM per year;
 - f. maximum clean-up material usage 248 gallons per

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year;

- g. opacity shall not exceed 20% as a six-minute average;
- h. maximum 0.003 pound PM per hour; and,
- i. maximum clean-up material OC content 6.94 pounds per gallon.

2. Applicable Compliance Methods:

- a. compliance with Recordkeeping requirements B above. Total monthly coating usage shall be determined by adding the number of gallons (B.1.c

above) of each coating used. The monthly usages shall be added to determine total yearly coating usage (see B.2 above);

- b. compliance shall be determined through the following:

- i. recordkeeping requirements (B) above;

- ii. each coating/clean-up material VOC content shall be multiplied by the number of gallons of that coating/clean-up material used during the month. The resulting products shall be added for the monthly VOC emissions. These total monthly emissions shall be added for the year to determine annual VOC emissions.

- c. compliance with VOC coating content limitation and annual coating usage limitation;

- d. OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee

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shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A;

- e. use of baffles, pre-filter, and baghouse filter during all periods of paint booth operation. PM emissions are determined by the following equation:

$$(SC) * (Va) * (1-TE) * (1-FEb) * (1-FEp) * (1-FEba) = PM \text{ emitted}$$

Where:

SC = solids content of the coating applied in pounds per gallon;

Va = volume of coating applied in gallons;

TE = transfer efficiency of painting equipment in decimal form (use 0.70);

FEb = baffle filter efficiency in decimal form (use 0.96);

FEp = pre-filter efficiency in decimal form (use 0.45);

FEba = bag filter efficiency in decimal form (use 0.85);

PM emitted = particulate matter emitted in pounds

- f. compliance with recordkeeping requirement B.1.c above. Monthly clean-up material usages shall be added annually;
- g. method 9 of 40 CFR Part 60, Appendix A; OAC rule 3745-17-03(B) (3);

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- h. use and maintenance of baffles, pre-filter, and bag filter at all times of paint booth operation; and,
- i. compliance with Recordkeeping requirements B above. Total monthly clean-up material usage shall be determined by adding the number of gallons (B.1.c above) of each coating used. The monthly usages shall be added to determine total yearly coating usage (see B.2 above).