



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
HURON 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: 03-14053

DATE: 10/28/2003

PolyOne Corporation - Norwalk Facility
Chad Martinez
P.O. Box 527 80 North West Street
Norwalk, OH 44857

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, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/28/2003
Effective Date: 10/28/2003**

FINAL PERMIT TO INSTALL 03-14053

Application Number: 03-14053
APS Premise Number: 0339020049
Permit Fee: **\$750**
Name of Facility: PolyOne Corporation - Norwalk Facility
Person to Contact: Chad Martinez
Address: P.O. Box 527 80 North West Street
Norwalk, OH 44857

Location of proposed air contaminant source(s) [emissions unit(s)]:
**80 North West Street
Norwalk, Ohio**

Description of proposed emissions unit(s):
Mixaco tubs and loading chute.

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.

PolyOne Corporation - Norwalk Facility
PTI Application: 03-14053
Issued: 10/28/2003

Facility ID: 0339020049

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	6.88
Pb	0.49

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

OAC rule 3745-17-07(B)

<p>Mixaco Tub Filling & Extruder Loading area (Chapter 31 modification of PTI number 03-13895 issued on 1/23/03). Modification to increase emission limitation associated with new control equipment, pigment usage & extruder loading.</p>	<p>OAC rule 3745-31-05(A)(3)</p>
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OAC rule 3745-17-11(B)

OAC rule 3745-17-07(A)

OAC rule 3745-17-08(B)

Applicable Emissions
Limitations/Control Measures

See A.2.a.

See A.2.e.

Stack Emissions:

1.41 lbs particulate emissions
(PE)/hr, 6.18 tons PE/yr

0.44 Lead (Pb)/yr

Visible PE shall not exceed 0%
opacity as a six-minute average
from the baghouse stack.

Fugitive Emissions:

0.70 tons PE/yr

0.05 ton Pb/yr

Visible fugitive PE shall not exceed
0% opacity as a three- minute
average (See A.2.f)

See A.2.b.

See A.2.b.

See A.2.c.

See A.2.d.

2. Additional Terms and Conditions

2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse with a maximum outlet concentration of 0.01 gr/dscf.

BAT requirements also include compliance with the terms and conditions of this permit.

- 2.b** 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.c** PolyOne Corporation is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.e** All particulate emissions are inclusive of and considered to be particulate matter less than 10 microns in size (PM 10). The hourly PE limitation also represents short-term emissions of Pb.
- 2.f** The visible fugitive PE limitation shall apply to the following:
 - i. the egress points (i.e. building windows, doors, roof monitors, etc.) serving this emissions unit.
 - ii. visible PE due solely to the operation of emissions unit P902

B. Operational Restrictions

- 1. The annual usage of pigments containing lead, cadmium, and/or chromium shall not exceed 1,750 tons.
- 2. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit 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 daily basis.
- 2. The permittee shall maintain monthly records of the following:

- a. the name and identification of each pigment employed;
 - b. documentation as to whether each pigment contains lead, cadmium, and/or chromium;
 - c. the amount of pigment employed, in tons, which contain lead, cadmium, and/or chromium;
 - c. the annual year to date amount of pigment employed, in tons, which contain lead, cadmium, and/or chromium (summation of 2.c. above, for each calendar month from January to December).
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

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

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the 1,750 tons per year usage restrictions for pigments containing lead, cadmium, and/or

chromium. The deviation reports shall also include any corrective actions that were taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states no deviations occurred during that year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**

1.41 lbs PE/hr and 6.18 tons PE/year from baghouse stack

Applicable Compliance Method

The hourly limitation was developed by multiplying a maximum outlet concentration of 0.01 gr/dscf, a maximum volumetric air flow rate of 16,500 dscf/min and conversion factors of lb/7000 grains and 60 min/hr. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1- 5.

The ton per year limitation was developed by multiplying the PE lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. **Emission Limitation**

0.44 ton Pb/yr from the baghouse stack

Applicable Compliance Method

The annual Pb emission limitation was developed by multiplying the annual usage restriction of 1,750 tons/yr for pigments containing Pb, a company supplied emission factor of 20 lbs lead/ton of lead containing pigment, dividing by 2000 lbs/ton and applying a 97.5% overall control efficiency for the baghouse control system. Therefore provided compliance is shown with the annual maximum usage restriction for pigments containing Pb through the record keeping in section C.2, compliance with the ton per year Pb emission limitation will be assumed.

- c. **Emission Limitation**

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from baghouse stack

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PolyO

PTI A

Issued: 10/28/2003

Emissions Unit ID: **P902**

Applicable Compliance Method

If required, compliance with the visible emission limitation specified above shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- d. **Emission Limitation**
0.70 ton PE/year (fugitive)

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying the company supplied emission factor of 20 lbs PE/ton by the maximum throughput of 2.66 tons per hour, a maximum operating schedule of 8760 hours per year, dividing by 2000 lbs/ton and applying a 99% baghouse capture efficiency and a 70% building control efficiency.

- e. **Emission Limitation**
0.05 ton Pb/yr (fugitive)

Applicable Compliance Method

The annual Pb emission limitation was developed by multiplying the annual usage restriction of 1,750 tons/yr for pigments containing Pb, a company supplied emission factor of 20 lbs lead/ton of lead containing pigment, dividing by 2000 lbs/ton and applying a 99% baghouse capture efficiency and a 70% building control efficiency. Therefore provided compliance is shown with the annual maximum usage restriction for pigments containing Pb through the record keeping in section C.2, compliance with the ton per year Pb emission limitation will be assumed.

- f. **Emission Limitation**
Visible particulate emissions shall not exceed 0% opacity, as a three-minute average from the egress points (i.e. building windows, doors, roof monitors, etc.) serving this emissions unit.

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None