State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
MARION COUNTY

Street Address: 50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 03-17216
Fac ID: 0351010061
DATE: 4/12/2007

Sika Corporation
Edwin Nutbrown
1682 Marion Williamsport Road
Marion, OH 43302

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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** **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 4/12/2007**
Terms and Conditions **Effective Date: 4/12/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-17216

Application Number:	03-17216
Facility ID:	0351010061
Permit Fee:	**$0**
Name of Facility:	Sika Corporation
Person to Contact:	Edwin Nutbrown
Address:	1682 Marion Williamsport Road Marion, OH 43302

Location of proposed air contaminant source(s) [emissions unit(s)]:
1682 Marion Williamsport Road
Marion, **Ohio**

Description of proposed emissions unit(s):
Visocrete line no. 2 (3000 gallon reactor, 1000 gallon condensation tank and 4 mmBtu/hr heater).

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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

Pollutant	Tons Per Year
CO	1.45
NOx	1.71
SO_2	2.28

Modification Issued: 4/12/2007

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 - (P015) - Visocrete line no. 2 (3000-gallon reactor, 1000-gallon condensation tank and 4 mmBtu/hr heater) Administrative modification of PTI #03-17216 issued on 1/30/07 to revised scrubber parameters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.52 lb sulfur dioxide (SO_2)/hr and 2.28 tons SO_2/yr, from the scrubber stack 0.33 lb carbon dioxide (CO)/hr and 1.45 tons CO/hr, from natural gas combustion 0.39 lb nitrogen dioxide (NOx)/hr and 1.71 tons NOx/yr, from natural gas combustion See A.2.a.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
OAC rule 3745-18-06(E)	See A.2.b.

2. Additional Terms and Conditions

2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of a wet scrubber with a 90% control efficiency for SO_2 and includes compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-10(B)(1).

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).

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

   The permittee shall collect and record the following information each day:

   a. the static pressure drop across the scrubber, in inches of water, on a once-per-shift basis;

   b. the scrubber water flow rate, in gallons per minute, on a once-per-shift basis; and

   c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   Whenever the monitored values for the pressure drop and scrubber water flow rate deviate from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

   In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop and scrubber water flow

rate immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

d. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 0.1 inch of water at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

e. The scrubber water flow rate shall be continuously maintained at a value of not less than 30 gallons per minute at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the ranges based upon information obtained during future emission tests that demonstrate compliance with the allowable SO2 emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the scrubber was outside of the acceptable range;

b. each period of time when the scrubber water flow rate was outside of the acceptable range;

c. an identification of each incident of deviation described in (a) and (b) above

where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in (a) and (b) where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken;

e. an identification of each incident of deviation described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

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

a. Emission Limitations: 0.52 lb SO_2/hr, 2.28 ton SO_2/yr, from scrubber stack

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly allowable SO2 emission limitation by applying a 90% control efficiency for use of a scrubber to a maximum uncontrolled emission rate of 5.19 lbs SO_2/hr. The maximum uncontrolled emission rate is based on "worst-case" mass balance calculations.

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation by testing in accordance with Methods 1 - 4 and 6 of 40 CFR Part 60, Appendix A.

The tons/yr limitation was established by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

b. Emission Limitations: 0.33 lb CO/hr, 1.45 tons CO/yr, from natural gas combustion

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum hourly natural gas consumption rate (3921.57 cu. ft/hr) by an emission factor of 84 lbs CO/mm cu. ft, from AP-42, Table 1.4-1 (revised 7/98).

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation by testing in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

The tons/yr limitation was established by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

c. Emission Limitations: 0.39 lb NOx/hr, 1.71 tons NOx/yr, from natural gas combustion

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum hourly natural gas consumption rate (3921.57 cu. ft/hr) by an emission factor of 100 lbs NOx/mm cu. ft, from AP-42, Table 1.4-1 (revised 7/98).

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by testing in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A.

The tons/yr limitation was established by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

d. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: Compliance with the visible emissions limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee may demonstrate compliance with the allowable PE limitation above by dividing an emission factor of 1.9 lbs PE (filtrable)/mm cu. ft [AP-42, Table 1.4-2 (revised 7/98)] by a heat content of 1020 Btu/cu. ft for natural gas.

If required, the permittee shall demonstrate compliance with the allowable PE limitation above by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None