



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Summit County
Application No: 16-1769

CERTIFIED MAIL

April 15, 1998

AMERICHEM, INC
PATRICK SURGEON
225 BROADWAY EAST
CUYAHOGA FALLS, OH 44221

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 with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
AKRON AIR POLLUTION CONTROL

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

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 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)

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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 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for AMERICHEM, INC located in Summit County. The sources 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>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
N001	Cleaning furnace #1-pyrolytic incinerator model number SCTR-9	See Additional Special Terms and Conditions.	3745-31-05 3745-17-07 3745-17-09	0.027 lb/hr NO _x (0.12 TPY) 0.017 lb/hr VOC (0.07 TPY) 0.002 lb/hr SO ₂ (0.01 TPY) 0.050 lb/hr CO (0.22 TPY) 1% opacity as six-minute average. 0.2 pound of particulate per 100 pounds of material charged (0.01 TPY PM)

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	0.01
NO _x	0.12
VOC	0.07
SO _x	0.01
CO	0.22

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

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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 Akron Air Pollution Control, 146 South High St., Room 904, Akron, Ohio 44308.

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 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 Akron Air Pollution Control, 146 South High St., Room 904, Akron, Ohio 44308.

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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The incinerator shall only be fired with natural gas.
2. The permittee shall not process parts which may emit vapors of toxic metals such as lead or mercury. The permittee shall not process parts or materials containing coatings or plastics which contain halogens such as chloride, fluorine, or bromine. This source shall be used to process organic polymers containing only carbon, hydrogen, and oxygen.
3. The incinerator shall be operated, maintained, and cleaned according to the manufacturer's recommendations so as to prevent the emissions of objectionable odors.
4. No parts or materials shall be charged until sufficient time has been allowed for the preheating of the secondary chamber. Both the primary and secondary burners shall be kept in operation during the entire time the incinerator is in use. The auxiliary burner shall be fired until the necessary burn-down time is achieved.
5. The secondary chamber shall be maintained at a temperature of at least 1400 degrees Fahrenheit.

B. Monitoring and/or Recordkeeping Requirements

None.

C. Reporting Requirements

None.

D. Testing Requirements

1. Compliance with the emission limitations in permit to install number 16-1769 shall be determined in accordance with the following methods:

a. Emission Limitation

1 percent opacity as a 6-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

b. Emission Limitation

0.2 pound particulate matter per 100 pounds charged
0.01 TPY particulate matter

Applicable Compliance Method

Future testing may be required in accordance with the procedures in Method 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation

0.017 pound/hour VOC
0.07 TPY VOC

Applicable Compliance Method

Multiply the 3-08-9-0013 SCC emission factor of 5.6 pounds/million cubic feet of material charged by the design capacity of the incinerator, in cubic feet per hour.

d. Emission Limitation

0.027 pound/hour NO_x
0.12 TPY NO_x

Applicable Compliance Method

Multiply the NO_x emission factor of 100 pounds/10⁶ cubic feet by the design capacity of the incinerator, in cubic feet per hour.

The emission factor was taken from AP-42, Fifth Edition, Table 1.4.1.

e. Emission Limitation

0.002 pound/hour SO_{2x}
0.01 TPY SO₂

Applicable Compliance Method

Multiply the SO₂ emission factor of 0.6 pound/10⁶ cubic feet by the design capacity of the incinerator, in cubic feet per hour.

The emission factor was taken from AP-42, Fifth Edition, Table 1.4.1.

f. Emission Limitation

0.050 pound/hour CO
0.22 TPY CO

Applicable Compliance Method

Multiply the CO emission factor of 21 pounds/10⁶ cubic feet by the design capacity of the incinerator, in cubic feet per hour.

The emission factor was taken from AP-42, Fifth Edition, Table 1.4.1.