

Universal Cooperatives, Inc.
1253 Industrial Drive
Napoleon, OH 43545

Emission Unit: P006

Description: Kettle #65 Tank Vent #1

Permit Status: Permit to Install
Issued: 7/30/1997
Effective: 7/30/1997
Permit to Operate application sent 9/1997 – no sign of PTO

**STATEMENT OF
THE OHIO ENVIRONMENTAL PROTECTION AGENCY
PERMIT TO INSTALL**

APPLICATION NUMBER

03-0139

AMOUNT DUE

\$400.00

FACILITY NAME

UNIVERSAL COOPERATIVES, INC.

**PURSUANT TO SEC.3745.11(V) OF THE OHIO REVISED
CODE, FULL AMOUNT OF THIS PERMIT FEE IS DUE
WITHIN THIRTY (30) DAYS OF THIS PERMIT.**

**IF PAYMENT IS LATE, THE PERSON RESPONSIBLE FOR THE
AIR CONTAMINANT SOURCE SHALL PAY AN ADDITIONAL
TEN PERCENT OF THE AMOUNT DUE FOR EACH MONTH THAT
IT IS LATE.**

MAKE CHECKS PAYABLE TO:

THE TREASURER OF THE STATE OF OHIO.

**RETURN THE STATEMENT WITH YOUR REMITTANCE USING
THE ENCLOSED ENVELOPE TO:**

**GENERAL ACCOUNTING
OHIO EPA
P.O. BOX 1049
COLUMBUS, OH 43216-1049**

**ALL QUESTIONS REGARDING THIS FEE SHOULD INCLUDE
THE APPLICATION NUMBER SHOWN ABOVE.**

RECEIVED AUG 4 1997

INSTALLATION CERTIFICATION

TO BE FILED UPON COMPLETION OF CONSTRUCTION AND PRIOR TO STARTUP

FACILITY NAME: UNIVERSAL COOPERATIVES, INC.

MAILING ADDRESS: MARTIN M. KARABIN
1253 INDUSTRIAL DRIVE
NAPOLEON, OH 43545

PERMIT TO INSTALL NO: 03-0139

SOURCE NO: 0335010023P006

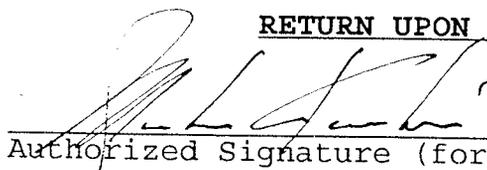
TO BE COMPLETED BY APPLICANT

DATE OF COMPLETION OF CONSTRUCTION: October 31, 1997

HAVE YOU FILED FOR A PERMIT TO OPERATE? X YES NO

This signature shall constitute personal affirmation that the source has been constructed in accordance with the terms and conditions in the Permit to Install and Permit to Install Application and with all other applicable Ohio EPA requirements.

RETURN UPON COMPLETION OF CONSTRUCTION



Authorized Signature (for Facility)

11/4/97

Date

Martin Karabin

Name

Operations Manager

Title

P.O. Box 471, Napoleon, OH 43545

Address

THIS CERTIFICATION SHOULD BE MAILED TO:

Northwest District Office - DAPC, Ohio EPA
347 North Dunbridge Road, P.O. Box 466
Bowling Green, Ohio 43402

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INSTALLATION CERTIFICATION

TO BE FILED UPON COMPLETION OF CONSTRUCTION AND PRIOR TO STARTUP

FACILITY NAME: UNIVERSAL COOPERATIVES, INC.

MAILING ADDRESS: MARTIN M. KARABIN
1253 INDUSTRIAL DRIVE
NAPOLEON, OH 43545

PERMIT TO INSTALL NO: 03-0139

SOURCE NO: 0335010023P006

TO BE COMPLETED BY APPLICANT

DATE OF COMPLETION OF CONSTRUCTION: _____

HAVE YOU FILED FOR A PERMIT TO OPERATE? _____ YES _____ NO

This signature shall constitute personal affirmation that the source has been constructed in accordance with the terms and conditions in the Permit to Install and Permit to Install Application and with all other applicable Ohio EPA requirements.

RETURN UPON COMPLETION OF CONSTRUCTION

Authorized Signature (for Facility)

Date

Name

Title

Address

THIS CERTIFICATION SHOULD BE MAILED TO:

Northwest District Office - DAPC, Ohio EPA
347 North Dunbridge Road, P.O. Box 466
Bowling Green, Ohio 43402

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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
Henry County
Application No: 03-0139
TOXIC REVIEW

CERTIFIED MAIL

July 30, 1997

UNIVERSAL COOPERATIVES, INC.
MARTIN M. KARABIN
1253 INDUSTRIAL DRIVE
NAPOLEON, OH 43545

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
NORTHWEST DISTRICT OFFICE, DAPC

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

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Permit to Install Terms and Conditions

Application No. 03-0139
APS Premise No. 0335010023
Permit Fee: \$400.00

Name of Facility: UNIVERSAL COOPERATIVES, INC.

Person to Contact: MARTIN M. KARABIN

Address: 1253 INDUSTRIAL DRIVE
NAPOLEON, OH 43545

Location of proposed source(s): 1253 INDUSTRIAL DRIVE
NAPOLEON, OHIO

Description of proposed source(s):
5000 GALLON LIQUID INSECTICIDE BLENDER WITH CONDENSER.

Date of Issuance: July 30, 1997

Effective Date: July 30, 1997

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

Donald R. Schreyer

Director

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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 UNIVERSAL COOPERATIVES, INC. located in Henry 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>
P006	5000 gallon liquid insecticide blender with condenser	Compliance with the permit allowable mass emission rates	3745-31-05 3745-21-07 (G) (2)	8 lbs organic compounds (OC)/hour, 40 lbs OC/day, and 7.3 tons OC/year See Additional Special Terms and Conditions

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	7.3

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 OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

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 OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

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.

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

INTRODUCTION: Universal Cooperatives, Inc. submitted a permit to install (PTI) application for the new installation of a 5000 gallon liquid insecticide blender (Kettle #65) equipped with a condenser for solvent reclamation, Ohio EPA emissions unit P006.

A. Applicable Emission Limitations and/or Control Requirements

1. Liquid insecticides blended in emissions unit P006 are "photochemically reactive" as defined in Ohio Administrative Code (OAC) Rule 3745-21-01(C)(5). According to applicable rule OAC Rule 3745-21-07(G)(2), organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day. The permit allowable mass emission rates for emissions unit P006 shall be 8 pounds organic compounds (OC)/hour, 40 pounds OC/day, and 7.3 tons OC/year.

2. This permit allows for the use of the raw materials and cleanup materials specified by the permittee in PTI Number 03-0139. In conjunction with the best available technology requirements of OAC 3745-31-05, the organic compound emission limits specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on the raw material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen3 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

<u>Pollutant</u>	<u>TLV (ug/m³)</u>	<u>Maximum Hourly Emission Rate (pounds/hour)</u>	<u>Predicted 1 Hour Maximum Ground-Level Concentration at the Fence- line (ug/m³)</u>	<u>Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³)</u>
Chlor- pyrifos	2,000	0.63	14.53	47.6

3. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office is required:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack

height) that would result in an exceedance of any MAGLC specified in the above table;

- c. a reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC; and,
- d. any change to the emissions unit or its method of operation that would either require an increase in the emission limitations(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

B. Operational Restrictions

1. The permittee shall install, operate, and maintain the condenser for Ohio EPA emissions unit P006 in accordance with the manufacturer's recommendations, instructions, and operating manuals.
2. For Ohio EPA emissions unit P006, the average temperature of the exhaust gases from the condenser during any 3-hour block of time shall not be greater than 75 degrees Fahrenheit, plus or minus 5 degrees Fahrenheit (as supplied by the permittee).
3. The permittee shall not allow the operation of Ohio EPA emissions unit P006 to cause a public nuisance in violation of Ohio Administrative Code (OAC) rule 3745-15-07.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when emissions unit P006 is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record the following information each day:
 - a. the average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day; and,

- b. a log or record of operating time for the capture (collection) system, monitoring equipment, and the associated emissions unit.
3. The permittee shall collect and record the following information each day to demonstrate compliance with OAC rule 3745-21-07(G)(2), 8 pounds of OC per hour and 40 pounds of OC per day:
 - a. the company identification of liquid insecticide blended;
 - b. the number of gallons of each liquid insecticide blended per day;
 - c. the organic compound content of each liquid insecticide blended, in pounds per gallon;
 - d. the total organic compound emission rate for all liquid insecticides blended, in pounds per day;
 - e. the total number of hours per day the emissions unit was in operation; and,
 - f. the average hourly organic compound emission rate for each liquid insecticide blended, i.e., (d)/(e), in pounds per hour (average).
4. These records shall be maintained in the company's files at the facility for a period of at least five years and shall be available for inspection, upon request, by personnel for the Ohio EPA.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emission unit P006 within five calendar days of any exceedance which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate exceeded 8 pounds per hour, and the actual average hourly organic compound rate for each such day; and,
 - b. an identification of each day during which the organic compound emission rate exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in condition (B)(2) above.

3. All reports, notifications, etc., required by the above terms and conditions are to be submitted to the Ohio Environmental Protection Agency, Northwest District Office, Division of Air Pollution Control, 347 North Dunbridge Road, Bowling Green, Ohio, 43402.

E. Testing Requirements

1. Emissions Limitation:
40 pounds OC/day

Applicable Compliance Method:

To determine the total daily organic compound emissions rate from all liquid insecticides blended, the following equation shall be used:

$$E = [OC \times G] \times (1-CE)$$

E = total daily organic compound emission rate, in pounds per day

OC = organic compound content of liquid insecticide blended, in pounds per gallon

G = number of gallons of liquid insecticide blended, in gallons per day

CE = fractional control efficiency of condenser (permittee supplied a control efficiency of 77.6 percent)

Emission Limitation:

8 pounds OC/hour

Applicable Compliance Method:

To determine the average hourly organic compound emissions rate, the following equation shall be used:

$$E = OC/H$$

E = average hourly organic compound emission rate, in pounds per hour

OC = daily organic compound emission rate, in pounds per day

H = number of hours the emissions unit was in operation

2. Any determination of OC content (OC content means all the organic compounds that are in a raw material and cleanup material expressed as pounds of OC per gallon), solids content, or density of a raw material shall be based on the raw materials as employed. The company shall determine the composition of the raw materials by formulation data supplied by the manufacturer of the raw materials, or from data determined by an analysis of each raw material, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of raw materials by

UNIVERSAL COOPERATIVES, INC.

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Reference Method 24 or an equivalent or alternative
Method.

F. Miscellaneous Requirements

None.