



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01415**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/22/2000

Malco Products Inc Alliance Packaging
Tim White Joel Pochron
12155 Fisher Ave NE
Alliance, OH 44601

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

Canton LAA



FINAL PERMIT TO INSTALL 15-01415

Application Number: 15-01415
APS Premise Number: 1576000585
Permit Fee: **\$800**
Name of Facility: Malco Products Inc Alliance Packaging
Person to Contact: Tim White Joel Pochron
Address: 12155 Fisher Ave NE
Alliance, OH 44601

Location of proposed air contaminant source(s) [emissions unit(s)]:
12155 Fisher Ave NE
Alliance, Ohio

Description of proposed emissions unit(s):
Bicarb storage silo and packaging line.

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 Related to Monitoring and Recordkeeping 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	0.83

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>P014 - Sodium bicarbonate (FDA food grade powder cleaner) storage and filling operation; includes pneumatic transfer of sodium bicarbonate from delivery trucks to the bulk storage silo (not enclosed in a building) with fabric filter; an enclosed screw conveyor to transfer the sodium bicarbonate powder to the filling and packaging line (totally enclosed in a building) including enclosed conveyor belts with a fabric filter servicing the filling and packaging line vented inside the building; company ID, Line 803.</p>	<p>OAC rule 3745-31-05 (A)(3)</p>	<p>The sum of the particulate matter emissions from the stacks of the fabric filters serving this emissions unit shall be no greater than 0.19 lb/hr.</p>
		<p>The sum of the particulate matter emissions from the stacks of the fabric filters serving this emissions unit shall be no greater than 0.83 TPY.</p>
		<p>See A.2.2.a through A.2.2.d below for visible particulate emissions limitations.</p>
		<p>See A.2.2.e through A.2.2.g below for applicable control measures.</p>
	<p>OAC rule 3745-17-07 (A)(1) and (B)(1)</p>	<p>The visible particulate emissions limitations from this applicable rule are less stringent than those from OAC 3745-31-05, below.</p>
	<p>OAC rule 3745-17-11</p>	<p>The particulate emissions limitation from this applicable rule are less stringent than that from OAC 3745-31-05, above.</p>

2. Additional Terms and Conditions

- 2.a** There shall be no visible particulate emissions from the stack of the fabric filter serving the bulk storage silo.
- 2.b** There shall be no visible particulate emissions from the stack of the fabric filter serving the filling and packaging line.
- 2.c** There shall be no visible particulate emissions from the enclosed screw conveyor that transfers sodium bicarbonate powder from the bulk storage silo to the filling and packaging line.
- 2.d** There shall be no visible particulate emissions from the rubber tube connecting the delivery truck to the stainless filling pipe on the bulk storage silo or from the connections to this rubber tube during the pneumatic transfer of sodium bicarbonate powder from delivery trucks to the bulk storage silo.
- 2.e** The bulk storage silo and the rubber tube connecting the delivery truck to the stainless filling pipe on the bulk storage silo and the connections to this rubber tube shall be served by a fabric filter.
- 2.f** The filling and packaging line shall be totally enclosed within a building and shall be served by a fabric filter.
- 2.g** The screw conveyor that transfers sodium bicarbonate powder from the bulk storage silo to the filling and packaging line shall be totally enclosed.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform checks, when the pneumatic transfer of sodium bicarbonate powder from delivery trucks to the bulk storage silo is taking place and when the weather conditions allow, for any visible particulate emissions from the stack of the fabric filter serving the bulk storage silo and for any visible particulate emissions from the rubber tube connecting the delivery truck to the stainless filling pipe on the bulk storage silo or from the connections to the rubber tube. The presence or absence of any visible 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 date of the observation;
 - b. the cause of the abnormal visible particulate emissions;
 - c. the total duration of any visible particulate emission incident in minutes; and
 - d. the corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack of the fabric filter serving the bulk storage silo and from the rubber tube connecting the delivery truck to the stainless filling pipe on the bulk storage silo and from the connections to the rubber tube, (b) the total duration of any visible particulate emission incident in minutes, and (c) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. and A.2 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

The sum of the particulate matter emissions from the stacks of the fabric filters serving this emissions unit shall be no greater than 0.19 lb/hr.

Applicable Compliance Method

Compliance shall be determined by calculation using emission factors. The maximum amount of sodium bicarbonate powder to be unloaded per hour is 17.5 tons. The uncontrolled emission factor to be used for the pneumatic loading of the sodium bicarbonate powder to the bulk storage silo is 0.27 lb PM/ton from AP-42 Table 11.12-2. The control efficiency of the fabric filter is assumed to be at least 99%. The maximum amount of sodium bicarbonate powder to be packaged is 8,980 lbs/hr. The controlled emission factor to be used for the filling and packaging is 0.0090 lb PM/1000 lbs packaged from AP-42 Table 11.26-1, SCC # 3-05-089-88.

The calculated emissions rate is equal to $(17.5 \text{ tons/hr})(0.27 \text{ lb/ton})(1 - 0.99) + (8,980 \text{ lbs/hr})(0.0090 \text{ lb/hr})$ or 0.13 lb/hr. Because the calculated emissions rate (0.13 lb/hr) is less than the allowable emission rate of 0.19 lb/hr compliance is shown.

- b. Emission Limitation

The sum of the particulate matter emissions from the stacks of the fabric filters serving this emissions unit shall be no greater than 0.83 TPY.

Applicable Compliance Method

The TPY limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation

The no visible particulate emissions limitations in A.2.2.a through A.2.2.d.

Malco Products Inc Alliance Packaging

PTI Application: 15-01415

Issued: 8/22/2000

Facility ID: 1576000585

Emissions Unit ID: P014

Applicable Compliance Method

Compliance shall be demonstrated based on the requirements specified in 40CFR Part 60, Appendix A, Method 22 and the methods and procedures in OAC rule 3745-17-03 (B)(4).

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 15-01415

Facility ID: 1576000585

FACILITY NAME Malco Products Inc Alliance PackagingFACILITY DESCRIPTION manufacturer of polishes and sanitation goods CITY/TWP Lexington TWPSIC CODE 2842 SCC CODE 3-05-089-88 EMISSIONS UNIT ID P014EMISSIONS UNIT DESCRIPTION Bicarb storage silo and filling line.DATE INSTALLED When the PTI is obtained

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

<u>Pollutants</u>	<u>Air Quality Description</u>	<u>Actual Emissions Rate</u>		<u>PTI Allowable</u>	
		<u>Short Term Rate</u>	<u>Tons Per Year</u>	<u>Short Term Rate</u>	<u>Tons Per Year</u>
<u>Particulate Matter</u>	<u>Attainment</u>	<u>0.13 lb/hr</u>	<u>0.57</u>	<u>0.19 lb/hr</u>	<u>0.83 TPY</u>
<u>PM₁₀</u>					
<u>Sulfur Dioxide</u>					
<u>Organic Compounds</u>					
<u>Nitrogen Oxides</u>					
<u>Carbon Monoxide</u>					
<u>Lead</u>					
<u>Other: Air Toxics</u>					

APPLICABLE FEDERAL RULES:NSPS? NANESHAP? NAPSD? NAOFFSET POLICY? NAWHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

The BAT determination is: (1) the use of a fabric filter on the bulk storage silo which controls PM emissions from the pneumatic unloading of the sodium bicarbonate powder; (2) the filling and packaging line to be in a total enclosure; (3) the use of a fabric filter on the filling and packaging line which is vented inside the total enclosure; (4) the screw conveyor that transfers sodium bicarbonate powder from the bulk storage silo to the filling and packaging line to be totally enclosed; and (5) visible particulate emissions limitations from stacks, screw conveyor and pneumatic unloading. The basis of this BAT determination is work on other similar permits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?NoOPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?\$ UnknownTOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?- YES X NOIDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 15-01415

Facility ID: 1576000585

FACILITY NAME Malco Products Inc Alliance Packaging

FACILITY DESCRIPTION manufacturer of polishes and sanitation goods CITY/TWP Lexington TWP

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

<i>Please fill out the following. If the checkrow does not work, replace it with an 'X'</i>	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, non-attainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Air Toxics modeling is not needed because sodium bicarbonate does not have an ACGIH TLV. Sodium bicarbonate powder is not a HAP. OAC 3745-17-08 is not applicable because the facility is not in an Appendix A area. The PM allowable from OAC 3745-17-11 is from Table I and is much greater than the BAT limit. See the hard copy calculations.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

- Synthetic Minor Determination and/or Netting Determination
Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
B. Facility Emissions and Attainment Status
C. Source Emissions
D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

The M/R T&C C.1. and the Reporting T&C D.1. have been modified from the standard language.

Please complete:

NEW SOURCE REVIEW FORM B

PTI Number: 15-01415

Facility ID: 1576000585

FACILITY NAME Malco Products Inc Alliance Packaging

FACILITY DESCRIPTION manufacturer of polishes and sanitation
goods

CITY/TWP Lexington TWP

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

PM

0.83

NEW SOURCE REVIEW FORM B

PTI Number: 15-01415

Facility ID: 1576000585

FACILITY NAME Malco Products Inc Alliance Packaging

FACILITY DESCRIPTION manufacturer of polishes and sanitation
goods

CITY/TWP Lexington TWP
