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Facility Name: **Fukuvi U.S.A.**

Application Number: **08-3854**

Date: **May 13, 1998**

GENERAL PERMIT CONDITIONS

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 SOURCE(S)

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 Ohio 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

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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) 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.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 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.

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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 made at least 90 days prior to start-up of the source.

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Fukuvi U.S.A.** located in **Montgomery** County. The emissions units 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>
P004	Laminated plastic line no. 3	*	3745-31-05 3745-21-07 (G)(2)	Total OC - 8.0 pounds/hour, ** including cleanup; 40 pounds/day, including cleanup; 7.3 TPY including total HAPs and cleanup Total HAPs - 20.64 pounds/day, including cleanup; 3.77 TPY, including cleanup
P005	Laminated plastic line no. 4	*	3745-31-05 3745-21-07 (G)(2)	Total OC - 8.0 pounds/hour, ** including cleanup; 40 pounds/day, including cleanup; 7.3 TPY

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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including total HAPs and cleanup
 Total HAPs - 20.64 pounds/day, including cleanup; 3.77 TPY, including cleanup

* Compliance with the applicable OAC regulations and specified allowable emission rates; recordkeeping; reporting.

** The 8.0 pounds OC/hour limit reflects the potential to emit for each emissions unit P004 and P005. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limit.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic compound total including total HAP emissions	14.6
Total HAPs	7.54

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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 **Regional Air Pollution Control Agency, 451 West Third Street, Dayton, OH 45422.**

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 **Regional Air Pollution Control Agency, 451 West Third Street, Dayton, OH 45422.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the

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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

A. Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for each emissions unit P004 and P005, to demonstrate compliance with the allowable organic compound emission rates:
 - a. the company identification for each coating and cleanup material;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon; and,
 - d. the total organic compound emission rate for all coatings and cleanup material, in pounds per day.
2. The permittee shall collect and record the following information each day for each emissions unit P004 and

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P005, to demonstrate compliance with the allowable hazardous air pollutant emission rates:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the hazardous air pollutant content of each coating and cleanup material, in pounds per gallon; and,
- d. the total hazardous air pollutant emission rate for all coatings and cleanup materials, in pounds per day.

B. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information for emissions units P004 and P005:
 - a. an identification of each day during which the total organic compound emission rate exceeded 40 pounds per day, and the actual organic compound emission rate for each such day. Additionally, an identification of each day during which the total hazardous air pollutant emission rate of 20.64 pounds per day is exceeded and the actual emission rate for each such day.

These quarterly deviation (excursion) reports shall be submitted in the following manner:

- b. reports of any required monitoring and/or recordkeeping information shall be submitted to the Regional Air Pollution Control Agency; and,
- c. 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

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the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventative measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control 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).

C. Compliance Methodologies

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation

8 pounds/hour total OC, including total HAPs

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements as specified in section A.1.

- b. Emission Limitation

40 pounds/hour total OC, including total HAPs

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements as specified in section A.1.

- c. Emission Limitation

7.3 TPY total OC, including total HAPs

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Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements as specified in section A.1., and shall be the sum of the daily OC emission rates for the calendar year.

d. Emission Limitation

20.64 pounds/day total HAPs

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements as specified in section A.2.

e. Emission Limitation

3.77 TPY total HAPs

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements as specified in section A.2., and shall be the sum of the daily total HAPs emission rates for the calendar year.