

A. Source Description

The applicant, Fabricated Packaging Materials, Inc. (F.P.M.), is a manufacturer of packaging material produced from expandable polystyrene foam. The facility is located at the following address:

2053 Commerce Drive
Lancaster, Ohio 43130

Fabricated Packaging Materials, Inc., has submitted a permit to install (PTI) application for the proposed Chapter 31 Modification of PTI 01-7468, as issued on December 3, 1998. The applicant has requested to increase the yearly permitted volatile organic compound (VOC) from 75 tons per year to 99 tons per year. The original permit was for a expandable polystyrene (EPS) foam line consisting of a pre-expander, aging bags, block mold, and drying room.

B. Facility Emissions and Attainment Status

Fabricated Packaging Materials, Inc. is classified as a Major Stationary Source pursuant to both non-attainment provisions and Title V operating permit requirements for volatile organic compound. Potential emissions from the expandable polystyrene (EPS) foam line trigger both non-attainment provisions and Title V operating permit threshold levels. Potential emissions, without the requested synthetic minor restrictions, are 578 tons of VOC per year. With the requested synthetic minor restrictions the year emissions of volatile organic compounds is limited to 99.0 tons of VOC per year.

Fairfield County is currently non-attainment for ozone. For all other criteria air pollutants, Fairfield County is attainment.

C. Source Emissions

Yearly potential emissions of volatile organic compounds from the expandable polystyrene (EPS) foam line is 578 tons of per year.

Limiting the annual production expandable polystyrene foam to 3,300,000 tons per year will reduce volatile organic compound potential emissions of 578 tons per year by 479 tons per year. Therefore, potential emissions of 578 tons per year are reduced to 99 tons per year ($578 - 479 = 99$).

D. Conclusion

Fabricated Packaging Materials, Inc. will become a synthetic minor facility by means of limiting the total yearly production expandable polystyrene foam to 3,300,000 tons. The volatile organic compound emissions of 578 tons per year are reduced to 99 tons per year.

The synthetic minor will effectively restrict volatile organic compound emissions below the Title V thresholds. The operational restrictions, record keeping, reporting will ensure that compliance with this permit is achieved and maintained.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

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

CERTIFIED MAIL

RE: DRAFT PERMIT TO INSTALL

FAIRFIELD COUNTY

Application No: 01-12173

Fac ID: 0123010275

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

DATE: 9/18/2007

Fabricated Packaging Materials Inc
Dale Stalter
2053 Commerce Drive
Lancaster, OH 43130

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$500** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-12173

Application Number: 01-12173
Facility ID: 0123010275
Permit Fee: **To be entered upon final issuance**
Name of Facility: Fabricated Packaging Materials Inc
Person to Contact: Dale Stalter
Address: 2053 Commerce Drive
Lancaster, OH 43130

Location of proposed air contaminant source(s) [emissions unit(s)]:
**296 Quarry Road
Lancaster, Ohio**

Description of proposed emissions unit(s):
EPS Preexpander vacuum block machine.

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

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**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	99.0

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 - (P001) - E.P.S. Pros LLC. expandable polystyrene (EPS) foam line consisting of a pre-expander, aging bags, block mold, and drying room. The terms of this permit supercede those identified in PTI 01-7468 issued December 3, 1998.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(1)	Emissions shall not exceed: 132 pounds per hour (lbs/hr) of volatile organic compounds (VOC). See Section A.2.a below.
OAC rule 3745-31-05(C)	The emissions of VOC from this emissions unit shall not exceed 99.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See Section A.2.2.b below.

2. Additional Terms and Conditions

- 2.a** The hourly emissions limitation for this emissions unit were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these limits.
- 2.b** The maximum annual production rate for the E.P.S. Pros LLC. pre-expander shall not exceed 3,300,000 lbs, based upon a rolling, 12-month summation of the production rates.

B. Operational Restrictions

1. Maximum pentane content of raw materials (EPS bead) used shall not exceed 6% by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

- a. identification of each lot of beads processed;
- b. the pentane content of EPS beads in each lot processed by the pre-expander;
- c. the production rate, in pounds, of the pre-expander;
- d. the rolling, 12-month summation of the production rates; and
- e. total VOC emissions, in tons, for the rolling, 12-month period.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC,. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation of the production rate. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the emission limitations established in section A.I.1 of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
132 pounds per hour (lbs/hr) of volatile organic compounds (VOC)

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly raw material usage times the maximum VOC content of raw material used, as a weight fraction (6.0% pentane), as certified by the manufacturer. The initial calculation is shown below:

$$(2,200 \text{ lbs of product / hour}) \times (0.06 \text{ lb pentane / lb of product}) = 132 \text{ lbs pentane / hr}$$

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25, and 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

Fabricated Packaging Materials Inc

PTI Application: 01-12173

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Facility ID: 0123010275

Emissions Unit ID: P001

b. Emission Limitation:

The emissions of VOC from this emissions unit shall not exceed 99.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be established by the record keeping found in Section C.1.

F. Miscellaneous Requirements

None