



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
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Columbus, OH 43215

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

**RE: FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL  
FRANKLIN COUNTY  
Application No: 01-05686**

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

**DATE:** 8/30/2001

Franklin International Inc  
Michael Desgranges  
2020 Bruck St  
Columbus, OH 43207

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

CDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-05686

Application Number: **01-05686**

APS Premise Number: **0125040070**

Permit Fee: **\$0**

Name of Facility: **Franklin International Inc**

Person to Contact: **Michael Desgranges**

Address: **2020 Bruck St  
Columbus, OH 43207**

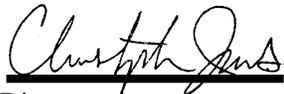
Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2020 Bruck St  
Columbus, OHIO**

Description of modification:  
**Adhesive mixing process.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Director

**Franklin International Inc**

**PTI Application: 01-05686**

**Modification Issued: 8/30/2001**

Facility ID: **0125040070**

## **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 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) 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**

**Franklin International Inc**

**PTI Application: 01-05686**

**Modification Issued: 8/30/2001**

Facility ID: **0125040070**

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 AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

### **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 emissions units listed below comprise the Permit to Install for **Franklin International Inc** located in **FRANKLIN** 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 &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P004	Adhesive mixing process (Ross #2)	Compliance with Ohio EPA toxics policy, and use of condenser and conservation vent.	3745-31-05(A)(3) 3745-21-07(G)(2)	6.5 lbs OC/hr, 32.6 lbs OC/day, no visible emissions from solids handling, and compliance with Additional Special Terms and Conditions.
P005	Adhesive mixing process (Littleford #1)	Compliance with Ohio EPA toxics policy, and use of condenser and conservation vent.	3745-31-05(A)(3) 3745-21-07(G)(2)	6.4 lbs OC/hr, 31.9 lbs OC/day, no visible emissions from solids handling, and compliance with Additional Special Terms and Conditions.

**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	11.8 (+8.99)

**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 Central District Office - DAPC, 3232 Alum Creek Drive, P.O. Box 163669, Columbus, Ohio 43216-3669.

## **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 Central District Office - DAPC, 3232 Alum Creek Drive, P.O. Box 163669, Columbus, Ohio 43216-3669.

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.

## **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

### **1. Temperature Restrictions, Monitoring, Recording, and Reporting**

The chilled water temperature leaving the condenser serving emission units P004 (Ross #2 mixer) and P005 (Littleford #1 mixer) shall not exceed 18 degrees C at any time during use of these mix tanks.

This facility shall install and maintain temperature monitoring devices to continuously monitor and record the peak chilled water temperature leaving the mix tank condenser vent on emission units P004 and P005. These devices shall have an accuracy of (+ or -) one percent of the temperature being monitored.

This facility shall submit quarterly reports of any excursions in which the peak chilled water temperature leaving the condenser on emission units P004 and P005 exceeds 18 degrees C.

A quarterly operation report is to be submitted for excursions of condenser chilled water temperature to the Ohio EPA, Central District Office. The quarterly operations report shall contain as a minimum: the source, the date, the time of occurrence, cause, calculation of the mass of organic compounds released, and any action taken to correct the excursion. These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year to document exceedences for the previous three calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30 respectively).

This facility shall prepare a manual outlining procedures for monitoring the mix tank condenser. It shall include an annual preventative maintenance inspection of the conservation vents serving mix tanks vents. The purpose shall be to insure that the conservation vent is clean and unobstructed and the pressure setting is set at 2 inches of water. This manual shall include a procedure for record keeping, including any forms, and for reporting malfunctions. This facility shall submit a copy of this manual to the Ohio EPA CDO for review and approval within 30 days of the effective date of this permit.

The records required by this term shall be retained in the Company's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

**2. Visible Emission Limitation**

There shall be no visible particulate emission from any stack or outside vent from the room containing the unit during addition of solids to emission units P004 and P005.

**3. Process Modification Restriction**

An assessment of toxic impact shall be made for any additional solvents with a greater additive impact than 38% acetone, 38% hexane, and 24% toluene emitted at 6.5 lbs/hr from emission units P004 and P005. This assessment shall be made using Ohio EPA's toxic policy which is in place at the time of the assessment.

The assessment required by this term and all supporting documentation shall be submitted to the Ohio Environmental Protection Agency, Central District Office for written approval prior to the use of a new solvent in emission units P004 and P005.

**4. Reserve the Right to Request Testing**

The Central District Office reserves the right to have the facility conduct, or have conducted, performance testing of the subject air contaminant sources in accordance with procedures approved by the Agency. The Director or his representative shall be allowed to witness the tests, examine testing equipment and acquire data to assure valid representation of the sources emissions and/or control equipment performance.