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Facility Name: **OSI Sealants, Inc.**

Application Number: **02-1725**

Date: **August 26, 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 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.

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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

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

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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.

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The air contaminant emissions units listed below comprise the Permit to Install for **OSI Sealants, Inc.** located in **Lake** 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>
P015	A Coweles Blade Mixer #3; Shar 2K; 2000 gallon capacity w/ N ₂ purging and conservation vent to condenser for OC recovery	Please see Additional Special Terms and Conditions; compliance with air Toxic Policy	3745-31-05 3745-21-07 (G)(2) 3745-31-05 3745-17-07 3745-17-11	8 lbs/Hr and 40 lbs/Day OCs; No visible emissions; 0% Opacity; PM : 1.5 lbs/hr, Less stringent than 3745-31-05 limit Less stringent than 3745-31-05 limit

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OCs	7.3 TPY
PM	6.57 TPY

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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 **Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.**

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.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. INTRODUCTION:

This is a permit to install for a 2000 gallon Shar Blade Mixer equipped with Nitrogen Purging and total enclosure venting to a conservation vent to a water cooled condenser for OC recovery, emission unit number P015, for adhesives and caulks at Ohio Sealants in Lake County.

B. OPERATIONAL RESTRICTIONS:

There shall be no visible particulate matter emissions from this emission unit.

Best Available Technology for this emission unit shall include Nitrogen Purging, total enclosure, and the use of a conservation vent and a water cooled condenser (although essential to the process). The solids charging station shall be exhausted to a shake down baghouse on the system.

C. EMISSION LIMITATIONS AND CONTROL REQUIREMENTS:

1. OSI Sealants, Inc. shall emit no more than 8 pounds an hour and 40 pounds a day of organic compounds from this mixer, EPA unit number P015.
2. OSI Sealants, Inc. shall emit no more than 1.50 lbs per hour particulate matter.

D. MONITORING AND RECORDKEEPING REQUIREMENTS:

1. OSI Sealants, Inc. shall keep daily records of the following for this mixer per batch:
 - a. solvent/organic compound usage;
 - b. solid usage; and,
 - c. operating hours
2. OSI Sealants, Inc. shall daily calculate daily and average hourly OC emissions from this mixer to confirm compliance with the 8 lbs/hr and 40 lbs/day limitations of this permit.

The emissions shall be calculated using the equations in the testing requirements section of this permit.

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3. OSI Sealants, Inc. shall calculate daily hourly PM emissions from this mixer to confirm compliance with the above mentioned limit.

The emission factor from AP-42 shall be used in the calculations with a 90% reduction of PM emissions for the use of total enclosure, a condenser, good operating practices, a shake down baghouse at the solids charging station, and N2 blanketing.

4. OSI Sealants, Inc. shall retain all records required by this permit on file for a period of not less than five years. All records shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

E. EXCURSION REPORTING REQUIREMENTS:

1. OSI Sealants, Inc. shall notify, in writing, the Ohio Environmental Protection Agency within 45 days in the event of any exceedance of any limit listed in this permit to install and provide a plan to prevent its reoccurrence.

Deviation (excursion) reports shall include the following information:

a. an identification of each day during which the average hourly organic compound emissions from the emission unit and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

b. an identification of each day during which the organic compound emissions from the emission unit and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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F. TESTING REQUIREMENTS:

1. Emission Limitation:

8 lbs/hr OC

Applicable Compliance Method:

Calculate actual emissions per batch as follows:

E= actual OC emissions in lbs/hr

E= organic compounds charged x EF divided by batch time in hours

EF= .0008 lbs OC emission/lb OC charged (this emission factor results from performance testing at OSI and is approved by OEPA)

2. Emission Limitation:

40 lbs/day OC

Applicable Compliance Method:

E= actual emissions in lbs/day

E= the sum of lbs/batch emissions x number of batches in a 24 hour period;

Or testing as required using a method approved by Ohio EPA

3. Emission Limitation:

1.50 lbs/hr PM

Applicable Compliance Method:

Calculate actual emissions per batch in as follows:

E= actual emissions in lbs/hr

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E= A x C divided by H
where

A=EF(AP42 paint and varnish) x lbs of solids charged per
batch

C= 1 -.9 (90%-estimated control efficiency); and

H= actual operating hours per batch

or use of method 5, 40CFR for compliance if required by
OEPA

4. Emission Limitation:

No visible emissions; 0% opacity

Applicable Compliance Method:

40 CFR, Appendix A, Method 9

G. MISCELLANEOUS REQUIREMENTS:

None