State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 13-2396
APS Premise No. 1318607686
Permit Fee: $1000.00

Name of Facility: EXCELLO SPECIALTY CO

Person to Contact: ROBERT ISAKSEN

Address: 4495 CRANWOOD PARKWAY
CLEVELAND, OH 44128

Location of proposed source(s): 18807 MILES RD
WARRENSVILLE TWP, OHIO

Description of proposed source(s):
MODIFICATION AND INSTALLATION OF ADHESIVE COATING EQUIPMENT CONSISTING OF 5 COATING LINES DUCTED TO AN AFTERBURNER.

Date of Issuance: December 11, 1991

Effective Date: December 11, 1991

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

Donald R Schregardus

Director

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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 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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a $15 application fee 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for EXCELLO SPECIALTY CO located in Cuyahoga County. The sources 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.

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Ohio EPA Source Number	Source Identification/ Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and/ or Control & Usage Requirements
K001	Adhesive Coating Line	*	3745-31-05 3745-21-07 3745-15-07	4 lbs/hr of VOC
K002	Adhesive Coating Line	*	3745-31-05 3745-21-07 3745-15-07	4 lbs/hr of VOC
K003	Adhesive Coating Line	*	3745-31-05 3745-21-07 3745-15-07	4 lbs/hr of VOC
K004	Adhesive Coating Line	*	3745-31-05 3745-21-07 3745-15-07	4 lbs/hr of VOC
K005	Adhesive Coating Line	*	3745-31-05 3745-21-07 3745-15-07	4 lbs/hr of VOC

* See Additional Special Terms and Conditions.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
VOC	87.5

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PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the

control equipment.

1. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

3. Tests shall be performed for the following sources and pollutants:

Source	Pollutant(s)
K001 - K005	VOC

The performance test shall measure the efficiency of the catalytic incinerator and shall also measure the collection efficiency of the hooding and ductwork.

4. The inlet temperature to the catalytic incinerator shall be a minimum of 600 degrees fahrenheit during the performance test.

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

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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 Cleveland Air Pollution Control, 1925 St. Clair, Cleveland, Ohio 44114.

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.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The overall control efficiency of the afterburner control system (which takes into consideration the capture efficiency of the ductwork) shall be at least 85 percent efficient by weight.

2. The destruction efficiency of the afterburner shall be at least 90 percent by weight.

3. The maximum allowable emission rate of organic compounds into the atmosphere from each coating line shall be 4 pounds per hour.

4. There shall be no objectionable odors or visible emissions in excess of 0 percent opacity from any of these sources.

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