OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1264
TOXIC REVIEW
SYNTHETIC MINOR

CERTIFIED MAIL

August 13, 1997

AUG 22

U.S. FIBERGLASS PRODUCTS, INC.
THOMAS COOMES
P.O. BOX 41
MIDDLEBRANCH, OH 44652

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

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.

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 with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL
RUDY ZUPAN, WOODWARD-CLYDE CONSULTANTS

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 15-1264
APS Premise No. 1576001621
Permit Fee: $600.00

Name of Facility: U.S. FIBERGLASS PRODUCTS, INC.

Person to Contact: THOMAS COOMES

Address: P.O. BOX 41
MIDDLEBRANCH, OH 44652

Location of proposed source(s): 2660 APPLEGROVE ST., N.E.
PLAIN TOWNSHIP, OHIO

Description of proposed source(s):
FIBERGLASS LAY-UP OPERATION #2 WITH SUPPRESSED RESIN & GEL-C OAT.

Date of Issuance: August 13, 1997

Effective Date: August 13, 1997

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

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

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 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for U.S. FIBERGLASS PRODUCTS, INC. located in Stark 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P003	Lay up operations (combination of spray lay up and hand lay up) to produce fiberglass reinforced plastic products utilizing vapor suppressed resin (unsaturated polyester resin), MEKP as catalyst, fiberglass, and acetone as clean-up solvent.	Compliance with OAC 3745-21-07(G)(2), use of low styrene content and vapor suppressed resins, use of HVLP spray gun, resin and clean-up solvent usage limitations and record-keeping	3745-21-07 (G)(2) 3745-31-05 (A)(3); Best Available Technology	8 lbs/hr Styrene 40 lbs/day Styrene Maximum resin usage of 1194 pounds per hour and 5970 pounds per day. The resins utilized in this emissions unit shall be vapor suppressed and shall contain no more than 44% styrene by weight. A High Volume Low Pressure (HVLP) spray gun shall be utilized in the spray lay up operation.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P004	Gel coat spraying operation to produce fiberglass reinforced plastic products utilizing gel coat (unsaturated polyester resin), MEKP as catalyst, fiberglass, and acetone as clean-up solvent.	Compliance with OAC 3745-21-07(G)(2), use of HVLP spray gun, use of low styrene content resins, coating and clean-up solvent usage limitations and record-keeping	3745-21-07 (G)(2) 3745-31-05 (A)(3); Best Available Technology	8 lbs/hr Styrene 40 lbs/day Styrene Maximum Gel Coat usage of 79 pounds per hour and 397 pounds per day. The gel coat utilized in this emissions unit shall contain no more than 33% styrene by weight. A High Volume Low Pressure (HVLP) spray gun shall be utilized in this operation.
(P003 and P004)	Emissions units P003 and P004 are contained within a single building served by a single stack with fiberglass exhaust filters	Compliance with the Air Toxics Policy and Fiberglass Filters to control PM emissions	3745-31-05 (A)(3); Best Available Technology	16.6 lbs/day Acetone 3.03 TPY Acetone The gases exiting the stack serving these emissions units shall be filtered with fiberglass exhaust filters which shall be maintained such that there are no visible emissions exiting the stack with compliance to be determined using Method 9.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
(P001, P002, P003, and P004), the entire facility	The U.S. Fiberglass Products Inc. facility. Emissions units P001 and P002 are subject to PTI 15-1263. This PTI and 15-1263 limit the potential to emit of OC's, acetone and styrene. Styrene is a Hazardous Air Pollutant (HAP), which is limited to 9.8 TPY for the entire facility which is less than the 10 TPY limit for a Title V facility. Therefore the facility is not subject to Title V requirements. This is a Synthetic Minor PTI.			53.7 lbs/day Styrene* 9.8 TPY Styrene* 49.8 lbs/day Acetone* 9.1 TPY Acetone* 103.5 lbs/day OC* 18.9 TPY OC*
			3745-31-10	See Additional Special Term and Condition E(1).

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Styrene	9.08*
Acetone	3.03 (P003 and P004)
Acetone	9.10*
OC	18.9*

* These emissions limits are for the entire facility.

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 Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

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 Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

See the Air Emissions Summary.

B. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, calculate as necessary, and record the following information for each day of operation for each of the emissions units P003 and P004:

   a. the company identification of each coating employed;

   b. the number of pounds of each coating employed;

   c. the styrene monomer content of each coating in weight percentage;

   d. the total styrene emission rate in pounds per day;

   e. the total number of hours the emissions unit was in operation; and,

   f. the average hourly styrene emission rate, (d)/(e), in pounds per hour (average).

   [Note: Coatings refer to the vapor suppressed resins used in Emissions Unit P003 and to the gel coat resins used in emissions unit P004.]

2. The permittee shall collect, calculate as necessary, and record the following information for each day of operation for the combined operation of emissions units P003 and P004:

   a. the number of pounds and gallons of acetone used; and,

   b. the number of pounds of acetone emitted each day.

3. The permittee shall collect, calculate as necessary, and record the following information each day of operation for the entire facility:

a. the styrene emission rate in pounds per day;

b. the acetone emission rate in pounds per day; and

c. the Organic Compounds (OC) emission rate in pounds per day (OC emissions are equal to the sum of the styrene and acetone emissions).

4. The permittee shall collect, calculate as necessary, and record each year the following emission rates for the entire facility:

a. the styrene emission rate in pounds per year and in tons per year;

b. the acetone emission rate in pounds per year and in tons per year; and

c. the OC emission rate in pounds per year and in tons per year.

5. Copies of invoices for the purchase of the resins and acetone showing quantities purchased, the type of vapor suppressed resin, the type of gel coat resin, and the styrene monomer content on a weight basis shall be maintained for a period of five (5) years at the facility.

C. Reporting Requirements

1. The permittee shall submit written deviation (excursion) reports, within 30 days of an excursion, which include the corrective actions taken to achieve compliance and the following information:

a. an identification of each day and which emissions unit during which the average hourly styrene emission rate in emissions units P003 or P004 exceeded 8 pounds per hour, and the actual average hourly styrene emission rate for each such day;

b. an identification of each day during which the styrene emission rate in emissions units P003 or P004 exceeded 40 pounds per day, and the actual styrene emission rate for each such day;

c. an identification of each day during which the styrene emission rate for the entire facility exceeded 53.7 pounds per day, and the actual styrene emission rate for each such day;

d. an identification of each year in which the styrene emission rate for the entire facility exceeded 9.8 tons per year and the actual styrene emission rate for each such year;

e. an identification of each hour during which the vapor suppressed resin usage rate exceeded 1194 pounds in emissions unit P003, and the actual vapor suppressed resin usage rate;

f. an identification of each hour during which the gel coat resin usage rate exceeded 79 pounds in emissions unit P004, and the actual gel coat resin usage rate;

g. an identification of each day during which the acetone emission rate from the combined operation of emissions unit P003 and P004 exceeded 16.6 pounds, and the actual acetone emission rate for each such day;

h. an identification of each day during which the acetone emission rate for the entire facility exceeded 49.8 pounds, and the actual acetone emission rate for each such day;

i. an identification of each year during which the acetone emission rate from the combined operation of emissions unit P003 and P004 exceeded 3.03 tons, and the actual acetone emission rate for each such year;

j. an identification of each year in which the acetone emission rate for the entire facility exceeded 9.10 tons per year, and the actual acetone emission rate for each such year;

k. an identification of each day in which the OC emission rate for the entire facility exceeded 103.5 pounds per day, and the actual OC emission rate for each such day; and,

l. an identification of each year in which the OC emission rate for the entire facility exceeded 18.9 tons per year, and the actual OC emission rate for each such year.

2. The permittee shall also submit an annual report by January 31 of each year which specifies the following emission rates in tons per year for the previous calendar year:

a. the styrene emission rate for emissions unit P003;

b. the styrene emission rate for emissions unit P004;

c. the styrene emission rate for the entire facility;

d. the acetone emission rate for the combined operation of emissions units P003 and P004;

e. the acetone emission rate for the entire facility; and,

f. the OC emission rate for the entire facility.

D. Compliance Methods and Testing Requirements

1. Compliance Methods Requirements

Compliance with the mass emissions limitation(s) and control / usage requirements in the Air Emission Summary of this Permit to Install listed below shall be determined in accordance with the following method(s):

Emission Limitation	Applicable Compliance Method
8 lbs/hr and 40 lbs/day Styrene; For Emissions Unit P003	Daily record keeping of coating (resin) usage, the styrene content of each coating, the operating hours per day, and the styrene emission factor from the application shall be used to calculate the daily and average styrene emission rate. The daily styrene emission rate in pounds of styrene emitted per day shall be calculated by using the following equation: (the number of pounds of resin used that day) times (the styrene content of the resin, in units of the number of pounds of styrene monomer per pound of resin) times (the emission factor of 0.0152 pound of styrene emissions per pound of resin used, which was supplied in the application). Note that if more than one resin is used on a particular day and the styrene content of these resins are different, then a separate calculation must be made for each resin and the resultant emissions from each different resin summed together to obtain the daily styrene emission rate in pounds of styrene emitted per day. Also note that the emission factor may have to be modified, as appropriate, based on the results of the future required emissions testing. In addition, the permittee shall not utilize more than 1194 pounds of resin with no more than 44% by weight styrene per hour in this emissions unit, documented in the record keeping. The hourly average styrene emission rate in pounds of styrene emitted per hour, on

	average, shall be calculated by dividing the calculated daily styrene emission rate by the number of hours that the emissions unit was operated that day. If the calculated hourly average styrene emission rate is less than or equal to 8 pounds of styrene per hour, then the hourly styrene emission allowable (8 lbs/hr styrene) is assumed to have been met. In addition, the permittee shall not utilize more than 5970 pounds of resin with no more than 44% by weight styrene per day in this emissions unit, documented in the record keeping. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the styrene contents of the resins.
8 lbs/hr and 40 lbs/day Styrene; For Emissions Unit P004	Daily record keeping of coating (gel coat resin) usage, the styrene content of each coating, the operating hours per day, and the styrene emission factor from the application shall be used to calculate the daily and average styrene emission rate. The daily styrene emission rate in pounds of styrene emitted per day shall be calculated by using the following equation: (the number of pounds of gel coat resin used that day) times (the styrene content of the gel coat resin, in units of the number of pounds of styrene monomer per pound of gel coat resin) times (the emission factor 0.10065 pound of styrene emissions per pound of gel coat resin used, which was supplied in the application and was derived from AP-42 information). Note that if more than one gel coat resin is used on a particular day and the styrene content of these gel coat resins are different, then a separate calculation must be made for each gel coat resin and the resultant emissions from each different gel coat resin summed together to obtain the daily styrene emission rate in pounds of styrene emitted per day. Also note that the emission factor may have to be modified, as appropriate, based on the results of the future required emissions testing. In addition, the permittee shall not utilize more than 79 pounds of gel coat resin per hour with no more than 44% by weight styrene in this emissions unit, documented in the record keeping.

	The hourly average styrene emission rate in pounds of styrene emitted per hour, on average, shall be calculated by dividing the calculated daily styrene emission rate by the number of hours that the emissions unit was operated that day. If the calculated hourly average styrene emission rate is less than or equal to 8 pounds of styrene per hour, then the hourly styrene emission allowable (8 lbs/hr styrene) is assumed to have been met. In addition, the permittee shall not utilize more than 397 pounds of gel coat resin per day with no more than 44% by weight styrene in this emissions unit, documented in the record keeping.
53.7 lbs/day and 9.8 TPY Styrene; For the entire facility	The calculated daily styrene emission rate from emissions units P001, P002, P003 and P004, shall be summed. If the sum is less than or equal to 53.7 pounds of styrene emitted per day, then the facility is in compliance for that day. The calculated daily facility styrene emissions shall be summed over the calendar year. If the sum is less than 9.8 tons of styrene per year (19,600 pounds), then the facility is in compliance for that calendar year.
16.6 lbs/day and 3.03 TPY Acetone; For Emissions Units P003 & P004	Daily and annual record keeping of acetone usage.
Comply with the Air Toxics Policy; For Emissions Units P003 & P004	Maintaining the emissions units per the PTI application and compliance with the Additional Special Terms and Conditions of this PTI.

2. <u>Emission Testing Requirements</u>

The permittee shall conduct, or have conducted, emission testing for each emissions unit, P003 and P004, in accordance with the following requirements:

a. the emission testing shall be conducted within **3 months of the first operation of the emissions units;**

b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for styrene: 8 lbs/hr for emission unit P003; 8 lbs/hr for emission unit P004;

c. the following test method shall be employed to demonstrate compliance with the allowable hourly mass emission rates: for styrene, from 40 CFR Part 60, Appendix A, Methods 1-4 and Method 18 (Measurement of Gaseous Organic Compound Emissions by Gas Chromatography), Method 25 (Determination of Total Gaseous Nonmethane Organic Emissions as Carbon), or Method 25A (Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer), whichever is most appropriate;

d. the test(s) for each emissions unit shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise approved by the Canton City Health Department, Air Pollution Control Division;

e. Intent to Test Notifications Requirements

Not later than 30 days prior to the proposed test date(s), this facility shall **submit** a separate **"Intent to Test" notification** for each of the emissions units P003 and P004 to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544, phone (330) 489-3385, fax (330) 489-3335.

Failure to submit such notifications for review and approval prior to the test(s) may result in the Canton City Health Department's refusal to accept the results of the emission test(s).

The "Intent to Test" notifications shall include but not be limited to the following proposed items:

i. describe in detail the test methods and procedures;
ii. the emissions unit operating parameters;
iii. the time(s) and date(s) of the test(s);
iv. the person(s) who will be conducting the test(s);
v. section H of the"Intent To Test" notification;
vi. a listing of the Ohio EPA Emissions unit numbers with an identification of which operation, process, or activity corresponds to each Ohio EPA Emissions unit number for all operations, processes, or activities that could vent exhaust gases to the test stack;
vii. a simple, non-dimensional sketch showing the ducting and stack arrangement including the relative position of all operations, processes, or activities that could vent exhaust gases to the test stack. The sketch shall also show the relative position of all organic compound control device(s), if any; and,
viii. a statement as to whether there are any other emissions, i.e. emissions not being emitted from

the test stack but being emitted into the air at other location(s) besides the test stack, for each operation, process or activity that could vent exhaust gases to the test stack;

f. personnel from the Canton City Health Department, Air Pollution Control Division, shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and,

g. a comprehensive written report on the results of the emission test(s), including the items indicated in Section K of the "Intent to Test" notification, shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division, within 30 days following completion of the test(s).

E. Miscellaneous Requirements

1. At such time that a particular stationary source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation established after August 7, 1980, on the capacity of the stationary source or modification otherwise to emit an air pollutant, such as a restriction on hours of operation, the requirements of rule 3745-31-10 of the Administrative Code through rule 3745-27 of the Administrative Code shall apply to the stationary source or modification as though construction had not yet commenced on the stationary source or modification.