



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43266-0149
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AKRON AIR
1992 AUG 18 AM 11:41

George V. Voinovich
Governor

Donald R. Schregardus
Director

August 12, 1992

CERTIFIED MAIL

Re: Modification to Permit to Install No. 16-1161
Portage County

Gencorp Polymer Products
165 S Cleveland Ave
Mogadore, OH 44260

Attention: Alan D. Sampson

Dear Sir:

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 of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 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 Board of Review 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 and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, OH 43215.

Very truly yours,

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

Enclosure

cc: US EPA
Akron Air Pollution Control

Issuance Date: August 12, 1992

Effective Date: August 12, 1992

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFICATION TO PERMIT TO INSTALL

Name of Applicant: Gencorp Polymer Products
Address: 165 S Cleveland Ave
City: Mogadore, Ohio
Telephone: (216) 628-9925

The Ohio EPA has received a request for a modification for the Ohio EPA Permit to Install referenced above.

The Permit to Install issued to Gencorp Polymer Products (PTI No. 16-1161) is hereby modified in the following manner:

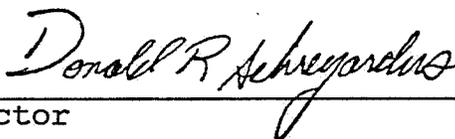
Terms and Conditions on Pages 4, 5 and 7 of Permit to Install issued July 15, 1992.

The reason for the modification is:

Due to an administrative error the Emission Summary has been changed.

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.

Ohio Environmental Protection Agency



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.

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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 GENCORP POLYMER PRODUCTS located in Portage 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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<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
T012	40,108 Gallon Pressure Tank/ T-53-1	Submerged Filling	3745-31-05	Pressure Relief Valve Shall be Maintained at 65 psig, 0.0 TPY Vinylidene Chloride
T013	40,108 Gallon Pressure Tank/ T-53-2	Submerged Filling	3745-31-05	Pressure Relief Valve Shall be Maintained at 65 psig, 0.0 TPY Butadiene
T014	52,848 Gallon Horizontal Cylindrical Tank/ T-53-20	Submerged Filling, Condenser for Vapor Control, Recordkeeping, Reporting	3745-31-05 40 CFR Part 60, Subpart Kb	The Condenser Shall Operate at a 78% by Weight Control Rate; 0.50 TPY Styrene
T015	10,689 Gallon Horizontal Cylindrical Tank/ T-424	Submerged Filling	3745-31-05	0.02 TPY Methacrylic Acid
T016	9,511 Gallon Vertical Cylindrical Tank/ T-426	Submerged Filling	3745-31-05	0.02 TPY Acrylic Acid
T017	9,974 Gallon Vertical Cylindrical Tank/ T-428	Submerged Filling	3745-31-05	0.01 TPY Acrylamide
N001	Pyrolysis Furnace/ B39-1 - Pyro	Use of An Afterburner and Interlock Safety Control	3745-31-05 3745-17-09	0.02 lb/hr Particulates, 0.002 lb/hr SO ₂ 0.02 lb/hr H.C. 0.03 lb/hr NO _x

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulates	0.06
SO ₂	0.01
NO ₂	0.12
HC ^x	0.10
Styrene	0.50
Methacrylic Acid	0.02
Acrylic Acid	0.02
Acrylamide	0.01

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T014	52,848 Gallon Tank	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Permit Management Unit
P.O. Box 1049
Columbus, OH 43266-0149

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and

Air Pollution Control
177 South Broadway
Akron, Ohio 44308

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 Akron Air Pollution Control, 177 South Broadway, Akron, Ohio 44308.

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.

MISCELLANEOUS STORAGE TANKS

Unless otherwise indicated, BAT for any miscellaneous storage tanks identified within this permit consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

<u>source number(s):</u>	<u>tank size:</u>
T014	52,848 Gallon

In addition,

- A. In accordance with 40 CFR 60.116b(a) and (c), the owner and operator of the following storage vessel(s) shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Records shall be retained for a minimum of two years.

<u>source number(s):</u>	<u>tank size:</u>
T014	52,848 Gallon

- B. In accordance with 40 CFR 60.116b(a) and (d), the owner and operator of the following storage vessel(s) shall notify the local field office within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. Records shall be retained for a minimum of two years.

<u>source number(s):</u>	<u>tank size:</u>
T014	52,848 Gallon