



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1365
SYNTHETIC MINOR

CERTIFIED MAIL

May 12, 1999

HOOVER COMPANY - PLANT #1
MONICA A SATRAPE
101 EAST MAPLE STREET
NORTH CANTON, OH 44720

RECEIVED

MAY 17 1999

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL

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. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. 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



Permit to Install Terms and Conditions

Application No. 15-1365
APS Premise No. 1576170258
Permit Fee: \$200.00

Name of Facility: HOOVER COMPANY - PLANT #1

Person to Contact: MONICA A SATRAPE

Address: 101 EAST MAPLE STREET
NORTH CANTON, OH 44720

Location of proposed source(s): 101 EAST MAPLE STREET
NORTH CANTON, OHIO

Description of proposed source(s):
INJECTION MOLDING MACHINE.

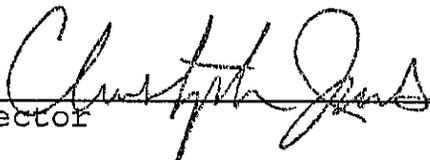
Date of Issuance: May 12, 1999

Effective Date: May 12, 1999

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



Director

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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.

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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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Hoover Company - Plant #1** located in **Stark** 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.

Ohio EPA Source <u>Number</u>	Source Identification <u>Description</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
P154	420 ton 92.25 pounds/hour Thermoplastic resin injection/ molding machine	See Additional Special Terms and Conditions	3745-21-07 (G) (9)	This emissions unit shall not employ any photochemically reactive material.
			3745-31-05	Emission limits for this emissions unit: 0.08 pound OC/hour 0.35 ton OC/year 0.06 pound styrene/hour 0.26 ton styrene/year Emission limit for all 106 injection/ molding machines at facility: 9.1 tons styrene/year 47.74 tons OC/year

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	0.35
OC*	47.74*
Styrene	0.26
Styrene*	9.10*

* This limit is for the total emissions from all injection/molding machines at this facility.

Note: The information contained under this Summary section is for informational purposes only and is not enforceable.

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. North, Canton, OH 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.

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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. North, Canton, OH 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

I. **Emissions Unit P154 - 420 ton**

A. **Operational Restrictions (P154)**

1. This emissions unit shall not employ any photochemically reactive materials as defined in OAC 3745-21-01(C)(5). This includes both plastics and any mold release agents employed.
2. The total annual styrene emissions from all 106 plastic injection/molding machines at this facility, including this new machine, shall not exceed 9.1 tons. To achieve this limit, the maximum amount of styrene emitting plastic molded shall not exceed 28,000,000 pounds/year, based upon a rolling, 12-month summation of the styrene emitting plastic molded.

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The total annual organic compound emissions from all 106 plastic injection/molding machines at this facility, including this new machine, shall not exceed 47.74 tons. To achieve this limit, the maximum amount of plastic molded shall not exceed 325,000,000 pounds/year, based upon a rolling, 12-month summation of the plastic molded.

The following is the list of the plastic injection/molding machines:

P044 No.2911504	P088 No.2932902	P132 No.2918802
P045 No.2912505	P089 No.2933002	P133 No.2911705
P046 No.2912605	P090 No.2933102	P134 No.2923802
P047 No.2913205	P091 No.2930302	P135 No.2918205
P048 No.2927501	P092 No.2931802	P136 No.2928901
P049 No.2920101	P093 No.2934102	P137 No.2929001
P050 No.2920201	P094 No.2917202	P138 No.2929101
P051 No.2923902	P095 No.2917302	P139 No.2929502
P052 No.2924102	P096 No.2914602	P140 No.2929402
P053 No.2924002	P097 No.2917502	P141 No.2929302
P054 No.2925402	P098 No.2919604	P142 No.2929202
P055 No.2920502	P099 No.2911004	P143 No.2923002
P056 No.2927302	P100 No.2912804	P144 No.2922602
P057 No.2927702	P101 No.2912904	P145 No.2923102
P058 No.2926002	P102 No.2913104	P146 No.2923202
P059 No.2926102	P103 No.2918904	P147 No.2929602
P060 No.2927902	P104 No.2919505	P148 No.2923602
P061 No.2928502	P105 No.2910805	P149 New
P062 No.2934801	P106 No.2914405	P150 New
P063 No.2926501	P107 No.2914305	P151 New
P064 No.2926401	P108 No.2912405	P152 New
P065 No.2926601	P109 No.2911405	P153 New
P066 No.2921101	P110 No.2915705	P154 New
P067 No.2928201	P111 No.2915605	
P068 No.2931201	P112 No.2919005	
P069 No.2932301	P113 No.2924201	
P070 No.2932601	P114 No.2924601	
P071 No.2934201	P115 No.2925201	
P072 No.2934301	P116 No.2925601	
P073 No.2934401	P117 No.2925801	
P074 No.2935001	P118 No.2926301	
P075 No.2934901	P119 No.2921701	
P076 No.2935201	P120 No.2925502	
P077 No.2930902	P121 No.2927802	
P078 No.2931002	P122 No.2928802	
P079 No.2931102	P123 No.2922402	
P080 No.2931402	P124 No.2928602	
P081 No.2931602	P125 No.2921602	
P082 No.2931502	P126 No.2932701	
P083 No.2931702	P127 No.2933201	
P084 No.2931902	P128 No.2933301	
P085 No.2932102	P129 No.2934001	
P086 No.2932502	P130 No.2934501	

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P087 No.2932802 P131 No.2930401

3. No plastics shall be molded which contain more than 0.4 percent styrene monomer.
4. To achieve enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table for all of the plastic injection/molding machines:

<u>Calendar Month(s)</u> <u>(After Permit Issuance)</u>	<u>Maximum Allowable</u> <u>Cumulative Lbs of</u> <u>Styrene Emitting</u> <u>Plastic Molded</u>	<u>Maximum</u> <u>Allowable</u> <u>Cumulative Lbs of</u> <u>Plastic Molded</u>
1	2,333,000	27,083,333
1-2	4,666,000	54,166,667
1-3	7,000,000	81,250,000
1-4	9,333,333	108,333,333
1-5	11,666,000	135,416,667
1-6	14,000,000	162,500,000
1-7	16,333,000	189,583,333
1-8	18,666,000	216,666,667
1-9	21,000,000	243,750,000
1-10	23,333,000	270,833,333
1-11	25,666,000	297,916,667
1-12	28,000,000	325,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations shall be based upon a rolling, 12-month summation of the amount of styrene emitting plastic molded and the total amount of plastic molded.

B. Monitoring and/or Recordkeeping Requirements (P154)

1. The permittee shall maintain records which list the following information for all plastic injection molding machines at this facility:
 - a. during the first 12 calendar months of operation following the issuance of this permit, the cumulative total amount of both the styrene containing plastic molded and of the total plastic molded in all 106 of the plastic injection/molding machines at this facility during each calendar month; and,
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of both the total amount of styrene emitting

plastic molded and of the total plastic molded in all 106 of the plastic injection/molding machines at this facility for each calendar month.

2. The permittee shall maintain records of the amount of styrene monomer in every grade of plastic that is employed in this emissions unit.

C. Reporting Requirements (P154)

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. any use of a grade of plastic which contains more than 0.4 percent styrene monomer;
 - b. any exceedances of the total cumulative monthly limitations on either the amount of styrene emitting plastic molded or the total plastic molded in the 106 plastic injection/molding machines at this facility;
 - c. any exceedances of the rolling, twelve-month limits of the amount of either the styrene emitting plastic molded or the total plastic molded; and,
 - d. any use of photochemically reactive mold release agents or plastics.

D. Compliance Methods and Testing Requirements (P154)

1. Compliance with the emission limitation(s) in these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

0.08 pound OC/hr

Applicable Compliance Method

Multiply the facility provided emission factor for styrene containing plastics of 0.00087 lb OC/lb plastic times the pounds of plastic used per hour.

$0.00087 \text{ lb OC/lb} \times 92.25 \text{ lbs/hr} = 0.08 \text{ lb OC/hr}$

b. Emission Limitation

0.06 pound styrene/hr

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Applicable Compliance Method

Multiply the facility provided emission factor for styrene containing plastics of 0.00065 lb styrene/lb styrene containing plastic times the pounds of styrene containing plastic used per hour.

0.00065 lb styrene/pound styrene plastic times 92.25 lbs/hr = 0.06 lb styrene/hr

c. Emission Limitation

9.1 tons styrene/year from the 106 machines at this facility

Applicable Compliance Method

Limiting the amount of styrene containing plastics molded to 28,000,000 pounds/year, based upon a rolling, 12-month summation. Use the facility supplied emission factor of 0.00065 lb styrene/lb of styrene plastic.

0.00065 lb styrene/pound of plastic times 28,000,000 lbs/yr times 1 ton/2000 lbs = 9.1 tons styrene/yr

d. Emission Limitation

47.74 tons OC/year from the 106 machines at this facility

Applicable Compliance Method

Limiting the amount of total plastics molded to 325,000,000 pounds/year, based upon a rolling, 12-month summation. The facility supplied emission factor for styrene containing plastic is 0.00087 lb OC/pound. The facility supplied emission factor for nonstyrene plastic is 0.00023 lb OC/pound

0.00087 lb OC/pound(styrene plastic) times 28,000,000 pounds/year times 1 ton/2000 lbs = 12.18 tons OC/yr

0.00023 lb OC/pound(nonstyrene plastic) times 297,000,000 lbs/year times 1 ton/2000 lbs = 34.16 tons/year

12.18 tons OC/yr + 34.16 tons OC/yr = 46.34 tons OC/yr

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e. Emission Limitation

0.35 ton OC/yr and 0.26 ton styrene/yr

Applicable Compliance Method

Multiply the hourly emission limit times 8,760 hrs/yr and then divide by 2,000.

E. Miscellaneous (P154)

1. None.

