



State of Ohio Environmental Protection Agency

**RE: PERMIT TO INSTALL REGISTRATION CERTIFIED MAIL  
STARK COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 15-01448**

**DATE: 12/21/2000**

The Hoover Company Industrial Park Plant  
Monica Satrape  
101 East Maple Street  
North Canton, OH 44720

Enclosed please find an Ohio EPA Permit to Install Registration which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit registration 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 within thirty (30) days after the notice of the Directors 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  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: Canton LAA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY  
PERMIT TO INSTALL REGISTRATION

Per  
To

Application Number: 15-01448  
APS Premise Number: 1576001049  
Permit Fee: **\$300**  
Name of Facility: The Hoover Company Industrial Park Plant  
Person to Contact: Monica Satrape  
Address: 101 East Maple Street  
North Canton, OH 44720

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**8200 Freedom Avenue**  
**Jackson Twp., Ohio**

Description of proposed emissions unit(s):  
**Four injection molding machines.**

Date of Issuance: 12/21/2000  
Effective Date: 12/21/2000

The above named entity is hereby granted a Permit to Install Registration 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

**Part I - GENERAL TERMS AND CONDITIONS****A. Permit to Install General Terms and Conditions****1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

#### **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

#### **6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

#### **7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

#### **8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

#### **9. Construction of New Sources(s)**

The proposed emissions unit(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 emissions unit(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 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.

#### **10. 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.

#### **11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **12. 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.

#### **13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**The Hoover Company Industrial Park Plant**

Facility ID: **1576001049**

PTI Application: **15-01448**

Issued: **12/21/2000**

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC               | 1                    |
| Styrene          | 0.74                 |

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property,<br/>and/or Equipment</u>  | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions<br/>Limitations/Control Measures</u>   |
|--|--------------------------------------|--|
| P062 - 170 ton, 19 pounds/hour, thermoplastic resin injection molding machine; No. IP16. | OAC rule 3745-31-05(A)(3)            | <p>Organic compound emissions shall not exceed 0.02 pound/hour and 0.07 ton/year.</p> <p>Styrene emissions shall not exceed 0.01 pound/hour and 0.05 ton/year.</p> <p>This emissions unit shall not employ any photochemically reactive material. See section A.2.a below.</p> <p>The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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. No plastic shall contain more than 0.4% styrene monomer.</p> |
|  | OAC rule 3745-21-07(G)(2)            | <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>  |

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Issued**

**Emissions Unit ID: P062**

**2. Additional Terms and Conditions**

- 2.a** This emissions unit shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This includes both plastics and any mold-release agents. If no photochemically reactive materials are used, this emissions unit is exempt from the limits on organic compound emissions found in OAC rule 3745-21-07 because it qualifies for the exemption found in OAC rule 3745-21-07(G)(9)(f).

**B. Operational Restrictions**

1. To achieve enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the production levels specified in the following table for all plastic injection molding machines:

| Calendar Month(s)<br>(After Permit Issuance) | Maximum Allowable<br>Cumulative lbs of<br>Styrene-Emitting<br>Plastic Molded |
|--|--|
| 1  | 2,333,000  |
| 1-2  | 4,666,000  |
| 1-3  | 7,000,000  |
| 1-4  | 9,333,000  |
| 1-5  | 11,666,000   |
| 1-6  | 14,000,000   |
| 1-7  | 16,333,000   |
| 1-8  | 18,666,000   |
| 1-9  | 21,000,000   |
| 1-10   | 23,333,000   |
| 1-11   | 25,666,000   |
| 1-12   | 28,000,000   |

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

**C. Monitoring and/or Record keeping Requirements**

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 styrene-emitting plastic molded in all 49 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 issuance of this permit, the rolling, 12-month summation of the total amount of styrene-emitting plastic molded in all 49 of the plastic injection molding machines at this facility for each calendar month.
2. The permittee shall collect and record the following information for each grade of plastic employed in this emissions unit:
    - a. the company identification of each grade of plastic;
    - b. the amount of styrene monomer in each grade of plastic; and
    - c. whether each grade of plastic contains photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
  3. The permittee shall collect and record the following information for each mold-release agent employed in this emissions unit:
    - a. the company identification of each mold-release agent employed; and
    - b. documentation on whether or not each mold-release agent is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5).

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. any use of plastic which contains more than 0.4% styrene monomer;
  - b. any exceedance of the total cumulative monthly limitations on the amount of styrene-emitting plastic molded in the 49 plastic injection molding machines at this facility;
  - c. any exceedances of the rolling, 12-month limits of the amount of styrene-emitting plastic molded; and
  - d. any use of photochemically reactive mold-release agents or plastics.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in these terms and conditions shall be determined in accordance with the following methods(s):
  - a. Emission Limitation:  
The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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.  
  
Applicable Compliance Method:  
Record keeping as required in section II.C.1.
  - b. Emission Limitation:  
0.02 pound OC/hour  
  
Applicable Compliance Method:  
Multiply the facility-provided emission factor for styrene containing plastics of 0.00087 lb OC/pound of plastic times the pounds of plastic made per hour.
  - c. Emission Limitation:  
0.01 pound styrene/hour  
  
Applicable Compliance Method:  
Multiply the facility-provided emission factor for styrene-emitting plastic of 0.00065 lb styrene/ lb of styrene-emitting plastic times the pounds of styrene-emitting plastic per hour.
  - d. Emission Limitation:  
0.07 ton OC/year and 0.05 ton styrene/year  
  
Applicable Compliance Method:  
Multiply the hourly emission limit times 8,760 hours/year and divide by 2,000.

**F. Miscellaneous Requirements**

1. FESOPs will be used to make the limits found in this permit to install federally enforceable.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>  | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u>  |
|--|--------------------------------------|---|
| P063 - 170 ton, 19 pounds/hour, thermoplastic resin injection molding machine; No. IP17. | OAC rule 3745-31-05(A)(3)            | <p>Organic compound emissions shall not exceed 0.02 pound/hour and 0.07 ton/year.</p> <p>Styrene emissions shall not exceed 0.01 pound/hour and 0.05 ton/year.</p> <p>This emissions unit shall not employ any photochemically reactive material. See section A.2.a below.</p> <p>The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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. No plastic shall contain more than 0.4% styrene monomer.</p> <p>The emission limitation specified by this rule is less stringent than the</p> |
|  | OAC rule 3745-21-07(G)(2)            |   |

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**Issued: 12/21/2000**

Emissions Unit ID: **P063**

emission limitation established  
pursuant to OAC rule  
3745-31-05(A)(3).

**2. Additional Terms and Conditions**

**2.a** This emissions unit shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This includes both plastics and any mold-release agents. If no photochemically reactive materials are used, this emissions unit is exempt from the limits on organic compound emissions found in OAC rule 3745-21-07 because it qualifies for the exemption found in OAC rule 3745-21-07(G)(9)(f).

**B. Operational Restrictions**

1. To achieve enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the production levels specified in the following table for all plastic injection molding machines:

| Calendar Month(s)<br>(After Permit Issuance) | Maximum Allowable<br>Cumulative lbs of<br>Styrene-Emitting<br>Plastic Molded |
|--|--|
| 1  | 2,333,000  |
| 1-2  | 4,666,000  |
| 1-3  | 7,000,000  |
| 1-4  | 9,333,000  |
| 1-5  | 11,666,000   |
| 1-6  | 14,000,000   |
| 1-7  | 16,333,000   |
| 1-8  | 18,666,000   |
| 1-9  | 21,000,000   |
| 1-10   | 23,333,000   |
| 1-11   | 25,666,000   |
| 1-12   | 28,000,000   |

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

**C. Monitoring and/or Record keeping Requirements**

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 styrene-emitting plastic molded in all 49 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 issuance of this permit, the rolling, 12-month summation of the total amount of styrene-emitting plastic molded in all 49 of the plastic injection molding machines at this facility for each calendar month.
2. The permittee shall collect and record the following information for each grade of plastic employed in this emissions unit:
    - a. the company identification of each grade of plastic;
    - b. the amount of styrene monomer in each grade of plastic; and
    - c. whether each grade of plastic contains photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
  3. The permittee shall collect and record the following information for each mold-release agent employed in this emissions unit:
    - a. the company identification of each mold-release agent employed; and
    - b. documentation on whether or not each mold-release agent is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5).

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. any use of plastic which contains more than 0.4% styrene monomer;
  - b. any exceedance of the total cumulative monthly limitations on the amount of styrene-emitting plastic molded in the 49 plastic injection molding machines at this facility;
  - c. any exceedances of the rolling, 12-month limits of the amount of styrene-emitting plastic molded; and
  - d. any use of photochemically reactive mold-release agents or plastics.

**E. Testing Requirements**

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

- a. Emission Limitation:

The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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.

Applicable Compliance Method:

Record keeping as required in section II.C.1.

- b. Emission Limitation:

0.02 pound OC/hour

Applicable Compliance Method:

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

- c. Emission Limitation:

0.01 pound styrene/hour

Applicable Compliance Method:

Multiply the facility-provided emission factor for styrene-emitting plastic of 0.00065 lb styrene/ lb of styrene-emitting plastic times the pounds of styrene-emitting plastic per hour.

- d. Emission Limitation:

0.07 ton OC/year and 0.05 ton styrene/year

Applicable Compliance Method:

Multiply the hourly emission limit times 8,760 hours/year and divide by 2,000.

**F. Miscellaneous Requirements**

1. FESOPs will be used to make the limits found in this permit to install federally enforceable.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>  | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u>   |
|--|--------------------------------------|--|
| P064 - 170 ton, 19 pounds/hour, thermoplastic resin injection molding machine; No. IP18. | OAC rule 3745-31-05(A)(3)            | Organic compound emissions shall not exceed 0.02 pound/hour and 0.07 ton/year.   |
|  |                                      | Styrene emissions shall not exceed 0.01 pound/hour and 0.05 ton/year.  |
|  |                                      | This emissions unit shall not employ any photochemically reactive material. See section A.2.a below.   |
|  | OAC rule 3745-35-07(B)               | The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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. No plastic shall contain more than 0.4% styrene monomer. |
|  | OAC rule 3745-21-07(G)(2)            | The emission limitation specified by this rule is less stringent than the emission limitation established  |

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**Issued: 12/21/2000**

Emissions Unit ID: **P064**

pursuant to OAC rule  
3745-31-05(A)(3).

## 2. Additional Terms and Conditions

- 2.a** This emissions unit shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This includes both plastics and any mold-release agents. If no photochemically reactive materials are used, this emissions unit is exempt from the limits on organic compound emissions found in OAC rule 3745-21-07 because it qualifies for the exemption found in OAC rule 3745-21-07(G)(9)(f).

## B. Operational Restrictions

1. To achieve enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the production levels specified in the following table for all plastic injection molding machines:

| Calendar Month(s)<br>(After Permit Issuance) | Maximum Allowable<br>Cumulative lbs of<br>Styrene-Emitting<br>Plastic Molded |
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| 1-6  | 14,000,000   |
| 1-7  | 16,333,000   |
| 1-8  | 18,666,000   |
| 1-9  | 21,000,000   |
| 1-10   | 23,333,000   |
| 1-11   | 25,666,000   |
| 1-12   | 28,000,000   |

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

## C. Monitoring and/or Record keeping Requirements

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 styrene-emitting plastic molded in all 49 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 issuance of this permit, the rolling, 12-month summation of the total amount of styrene-emitting plastic molded in all 49 of the plastic injection molding machines at this facility for each calendar month.
2. The permittee shall collect and record the following information for each grade of plastic employed in this emissions unit:
    - a. the company identification of each grade of plastic;
    - b. the amount of styrene monomer in each grade of plastic; and
    - c. whether each grade of plastic contains photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
  3. The permittee shall collect and record the following information for each mold-release agent employed in this emissions unit:
    - a. the company identification of each mold-release agent employed; and
    - b. documentation on whether or not each mold-release agent is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5).

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. any use of plastic which contains more than 0.4% styrene monomer;
  - b. any exceedance of the total cumulative monthly limitations on the amount of styrene-emitting plastic molded in the 49 plastic injection molding machines at this facility;
  - c. any exceedances of the rolling, 12-month limits of the amount of styrene-emitting plastic molded; and
  - d. any use of photochemically reactive mold-release agents or plastics.

**E. Testing Requirements**

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

- a. Emission Limitation:

The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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.

Applicable Compliance Method:

Record keeping as required in section II.C.1.

- b. Emission Limitation:

0.02 pound OC/hour

Applicable Compliance Method:

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

- c. Emission Limitation:

0.01 pound styrene/hour

Applicable Compliance Method:

Multiply the facility-provided emission factor for styrene-emitting plastic of 0.00065 lb styrene/ lb of styrene-emitting plastic times the pounds of styrene-emitting plastic per hour.

- d. Emission Limitation:

0.07 ton OC/year and 0.05 ton styrene/year

Applicable Compliance Method:

Multiply the hourly emission limit times 8,760 hours/year and divide by 2,000.

**F. Miscellaneous Requirements**

1. FESOPs will be used to make the limits found in this permit to install federally enforceable.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>   | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|--------------------------------------|--|
| P065 - 525 ton, 221 pounds/hour, thermoplastic resin injection molding machine; No. IP36. | OAC rule 3745-31-05(A)(3)            | Organic compound emissions shall not exceed 0.19 pound/hour and 0.79 ton/year.   |
|   |                                      | Styrene emissions shall not exceed 0.14 pound/hour and 0.59 ton/year.  |
|   |                                      | This emissions unit shall not employ any photochemically reactive material. See section A.2.a below.   |
|   | OAC rule 3745-35-07(B)               | The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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. No plastic shall contain more than 0.4% styrene monomer. |
|   | OAC rule 3745-21-07(G)(2)            | The emission limitation specified by this rule is less stringent than the  |

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**The H**

PTI A<sub>1</sub>

**Issued: 12/21/2000**

Emissions Unit ID: **P065**

emission limitation established  
pursuant to OAC rule  
3745-31-05(A)(3).

## 2. Additional Terms and Conditions

- 2.a** This emissions unit shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This includes both plastics and any mold-release agents. If no photochemically reactive materials are used, this emissions unit is exempt from the limits on organic compound emissions found in OAC rule 3745-21-07 because it qualifies for the exemption found in OAC rule 3745-21-07(G)(9)(f).

## B. Operational Restrictions

1. To achieve enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the production levels specified in the following table for all plastic injection molding machines:

| Calendar Month(s)<br>(After Permit Issuance) | Maximum Allowable<br>Cumulative lbs of<br>Styrene-Emitting<br>Plastic Molded |
|--|--|
| 1  | 2,333,000  |
| 1-2  | 4,666,000  |
| 1-3  | 7,000,000  |
| 1-4  | 9,333,000  |
| 1-5  | 11,666,000   |
| 1-6  | 14,000,000   |
| 1-7  | 16,333,000   |
| 1-8  | 18,666,000   |
| 1-9  | 21,000,000   |
| 1-10   | 23,333,000   |
| 1-11   | 25,666,000   |
| 1-12   | 28,000,000   |

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

## C. Monitoring and/or Record keeping Requirements

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 styrene-emitting plastic molded in all 49 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 issuance of this permit, the rolling, 12-month summation of the total amount of styrene-emitting plastic molded in all 49 of the plastic injection molding machines at this facility for each calendar month.
2. The permittee shall collect and record the following information for each grade of plastic employed in this emissions unit:
    - a. the company identification of each grade of plastic;
    - b. the amount of styrene monomer in each grade of plastic; and
    - c. whether each grade of plastic contains photochemically reactive materials (PRM) as defined in OAC rule 3745-21-01(C)(5).
  3. The permittee shall collect and record the following information for each mold-release agent employed in this emissions unit:
    - a. the company identification of each mold-release agent employed; and
    - b. documentation on whether or not each mold-release agent is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5).

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. any use of plastic which contains more than 0.4% styrene monomer;
  - b. any exceedance of the total cumulative monthly limitations on the amount of styrene-emitting plastic molded in the 49 plastic injection molding machines at this facility;
  - c. any exceedances of the rolling, 12-month limits of the amount of styrene-emitting plastic molded; and
  - d. any use of photochemically reactive mold-release agents or plastics.

### **E. Testing Requirements**

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

- a. Emission Limitation:

The total annual styrene emissions from all 49 plastic injection molding machines at this facility shall not exceed 9.1 tons/year. 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.

Applicable Compliance Method:  
Record keeping as required in section II.C.1.

- b. Emission Limitation:  
0.19 pound OC/hour

Applicable Compliance Method:  
Multiply the facility-provided emission factor for styrene containing plastics of 0.00087 lb OC/pound of plastic times the pounds of plastic made per hour.

- c. Emission Limitation:  
0.14 pound styrene/hour

Applicable Compliance Method:  
Multiply the facility-provided emission factor for styrene-emitting plastic of 0.00065 lb styrene/ lb of styrene-emitting plastic times the pounds of styrene-emitting plastic per hour.

- d. Emission Limitation:  
0.79 ton OC/year and 0.59 ton styrene/year

Applicable Compliance Method:  
Multiply the hourly emission limit times 8,760 hours/year and divide by 2,000.

### **F. Miscellaneous Requirements**

1. FESOPs will be used to make the limits found in this permit to install federally enforceable.