

Synthetic Minor Determination and/or  Netting Determination

Permit To Install **01-08730**

A. Source Description

Capital Resins (CRC) submitted PTI application for the 4,000 gallon resin reactor and 1,000 gallon dryer after characterizing acetonitrile and glycol ether PM. emissions during testing in December 2002.

B. Facility Emissions and Attainment Status

CRC is an existing facility located in the City of Columbus. Franklin County is in attainment for all criteria pollutants. Potential uncontrolled methanol and formaldehyde emissions may exceed the Title V threshold. for individual HAPs. Table 1 presents CRC synthetic minor strategy listing federally enforceable controlled rates for OC and HAP emissions.

Pollutant	Restricted Emissions (tons/year)
Organic Compounds (OC)	67.6
Dimethyl ether	5.0
Acetone	11.3
LDAR fugitives	1.7
<b>Hazardous Air Pollutant (HAP)</b>	18.5
Methanol	7.7
Formaldehyde	6.7
Phenol	0.59
Acetonitrile	1.64
Glycol ether PM	0.34
Toluene	1.51

C. Source Emissions

Based on analytical data from emission testing in December, 2002, the R-5 reactor would emit 1.19 lbs glycol ether PM and 8.67 lbs acetonitrile per batch during 24 hr batch production cycle. CRC is proposing to limit acetonitrile and glycol ether PM to 1.64 tons and 0.25 ton per year based on production of 30 batches per month.

D. Conclusion

Batch production restrictions will limit annual facility-wide emissions to 1.64 ton acetonitrile, 0.25 ton glycol ether PM and 18.5 tons total HAP emissions, therefore Capital Resins will not be considered a major source subject to the provisions of Title V in 40 CFR part 70 and MACT standards for resin manufacturing.



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
FRANKLIN COUNTY  
Application No: 01-08730**

**CERTIFIED MAIL**

**DATE: 6/17/2003**

Capital Resin Corp  
Anne Tyler  
324 Dering Ave  
Columbus, OH 432072956

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

CDO

**FRANKLIN COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08730 FOR AN AIR CONTAMINANT SOURCE FOR  
CAPITAL RESIN CORP**

On 6/17/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Capital Resin Corp**, located at **324 Dering Ave, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08730:

**Reactor number 5.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417  
[(614)728-3778]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 01-08730**

Application Number: 01-08730  
APS Premise Number: 0125040238  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Capital Resin Corp  
Person to Contact: Anne Tyler  
Address: 324 Dering Ave  
Columbus, OH 432072956

Location of proposed air contaminant source(s) [emissions unit(s)]:

**324 Dering Ave  
Columbus, Ohio**

Description of proposed emissions unit(s):

**Reactor number 5.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

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Director

Capital Resin Corp

Facility ID: 0125040238

PTI Application: 01-08730

Issued: To be entered upon final issuance

**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**

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

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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

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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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**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**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

#### 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	1.89
Acetonitrile	1.64
Glycol ether PM	0.25

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**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, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - Resin reactor R-5 w/condenser (4,000 gallon) with steam jacketed vacuum dryer w/condenser (1,000 gallon) for acetoguanamine production.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.45 lbs/hr and 1.89 tons per year. See A.2.a below.
	OAC rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-17-08(B).  Acetonitrile emissions shall not exceed 8.67 lbs/batch and 1.64 tons per rolling, 12-month period. See A.2.b-c and B.3 below.
	OAC rule 3745-21-07(G)(2)	Glycol ether PM emissions shall not exceed 1.19 lbs/batch and 0.25 ton per rolling, 12-month period. See A.2.b-c and B.3 below.
	OAC rule 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See A.2.d, B.1 and B.2 below.  Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

**2. Additional Terms and Conditions**

- 2.a** This permit supercedes PTI 01-3895 issued November 18, 1992 and represents a net allowable increase of 0.29 tons OC per year.
- 2.b** The facility-wide individual and combined hazardous air pollutant (HAP)<sup>1</sup> emissions shall

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not exceed 9.9 tons and 24.9 tons per rolling 12-month period, respectively, by limiting the total HAP emissions from all emissions units. The permittee shall restrict total OC emissions to less than 99.9 ton per rolling 12- month period.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

- 2.c** The annual emission limitations of 1.89 ton OC, 1.64 ton acetonitrile, and 0.25 ton glycol ether PM were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.d** Emission testing conducted in December 2002, verified compliance with OAC rule 3745-21-07(G)(2) and continued compliance with that rule shall be demonstrated by the record keeping requirement of this permit.

**B. Operational Restrictions**

1. The average temperature of the exhaust gases from the condenser on the reactor, for any 3-hour block of time, shall not be more than 77 degrees Fahrenheit.
2. The average temperature of the exhaust gases from the condenser on the dryer, for any 3-hour block of time, shall not be more than 75 degrees Fahrenheit.
3. The permittee shall not produce more than 30 batches of acetoguanamine resin during any monthly period.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condensers on the reactor and dryer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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2. The permittee shall collect and record the following information each day of resin production:
  - a. The average temperature of the exhaust gases from the condensers during each during each of the 8 3-hour blocks of time per day; and
  - b. A log or record of downtime for the control device and monitoring equipment, when the associated emissions unit is in operation.
3. The permittee shall maintain the following information for each day of resin production in a monthly record, to be completed during the first week of the following month:
  - a. The identification and date of completion for each batch produced; and
  - b. A summation of the numbers of each batch completed during each monthly period.
4. The permittee shall collect and record the following information for each month for the facility:
  - a. The individual HAP<sup>1</sup> content for each HAP of each batch produced, in pounds of individual HAP per batch produced;
  - b. The total combined HAP content for each batch produced in pounds of combined HAPs per batch produced (sum of all the individual HAP contents from a);
  - c. The total individual HAP emissions for each HAP emitted from batches produced, in pounds or tons per month and pounds or tons per rolling 12-month period (the sum of the appropriate lbs per batch emissions factor times the number of batches produced);
  - d. The total combined HAP emissions from all HAPs emitted from batches produced, in pounds or tons per month and pounds or tons per rolling 12-month period (the sum of the appropriate lbs per batch emissions factor times the number of batches produced); and
  - e. The total OC emissions in tons per rolling 12-month period.
5. The permit to install for this emissions unit P012 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetonitrile

Maximum Hourly Emission Rate (lbs/hr): 2.25

TLV (mg/m<sup>3</sup>): 67

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 655.6

MAGLC (ug/m3): 1,595

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Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. An identification of all 3-hour blocks of time during which the average temperature of the exhaust gases from the condensers exceeded the temperature limitation specified above in terms B.1 and 2;
  - b. An identification of all exceedances of the rolling 12-month facility-wide emission limitations for individual HAP and combined HAPs levels; and
  - c. An identification of all exceedances of the rolling 12-month facility-wide emission limitations for OC.
2. These deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.
3. The permittee shall submit annual reports to the Ohio EPA, Central District Office which summarizes the Acetonitrile, Glycol ether PM, total HAP, and OC emissions emitted from this emissions unit. These annual reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

#### E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 2.45 lbs/hr.  
  
Applicable Compliance Method:  
Compliance with the hourly OC emission limitation may be demonstrated by summing the maximum hourly emission rates of 2.25 lbs acetonitrile and 0.195 lb glycol ether PM determined using USEPA Method 18 sampling during emission testing on December 17, 2002 while charging acetonitrile and blending with glycol ether PM.
  - b. Emission Limitation:  
OC emissions shall not exceed 1.89 tons/yr.  
  
Applicable Compliance Method:  
Compliance with the annual OC emission limitation may be demonstrated by summing the batch emission rates of 8.67 lbs acetonitrile and 1.19 lbs glycol ether PM (9.86 lbs OC/batch) determined using USEPA Method 18 sampling during emission testing on December 17, 2002 multiplied by 360 batches per year. An additional 0.12 lb OC/yr is

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generated as a working loss during transfer to storage tanks. Compliance is ensured, if the permittee demonstrates compliance with the operational restrictions, monitoring and record keeping requirements of this permit.

- c. Emission Limitation:  
Acetonitrile emissions shall not exceed 8.67 lbs/batch.

Applicable Compliance Method:

Compliance with the batch acetonitrile emission limitation may be demonstrated by summing the hourly acetonitrile emission rates determined with USEPA Method 18 sampling during testing on December 17, 2002 of the reactor and dryer.

- d. Emission Limitation:  
Acetonitrile emissions shall not exceed 1.64 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual acetonitrile emission limitation may be demonstrated by multiplying the batch emission rates of 8.67 lbs acetonitrile by 360 batches per year. An additional 0.08 lb acetonitrile/yr is generated during transfer to storage tanks. Compliance is ensured, if the permittee demonstrates compliance with the operational restrictions, monitoring and record keeping requirements of this permit.

- e. Emission Limitation:  
Glycol ether PM emissions shall not exceed 1.19 lbs/batch.

Applicable Compliance Method:

Compliance with the batch glycol ether PM emission limitation may be demonstrated by summing the hourly glycol ether PM emission rates determined with USEPA Method 18 sampling during testing on December 17, 2002 of the reactor and dryer.

- f. Emission Limitation:  
Glycol ether PM emissions shall not exceed 0.25 ton per rolling 12-month period.

Applicable Compliance Method:

Compliance with the annual glycol ether PM emission limitation may be demonstrated by multiplying the batch emission rates of 1.19 lbs glycol ether PM by 360 batches per year. An additional 0.04 lbs glycol ether PM/yr is generated during transfer to storage tanks. Compliance is ensured, if the permittee demonstrates compliance with the operational restrictions, monitoring and record keeping requirements of this permit.

- g. The facility-wide individual and combined HAP emissions shall not exceed 9.9 tons and

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24.9 tons per rolling 12-month period, respectively, by limiting the total HAP emissions from all emissions units.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements in section C.4 of this permit.

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- h. The permittee shall restrict total OC emissions to less than 99.9 ton per rolling 12- month period

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements in section C.4 of this permit.

**F. Miscellaneous Requirements**

None