



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:

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

Re: Permit to Install
Franklin County
Application No: 01-6759

CERTIFIED MAIL

January 21, 1998

CAPITAL RESINS CORPORATION
MICHAEL BLACK
324 DERING AVENUE
COLUMBUS, OH 43207

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
CENTRAL DISTRICT OFFICE, DAPC
TAMMY HILKENS, DAPC, ENGINEERING

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 01-6759
APS Premise No. 0125040238
Permit Fee: \$600.00

Name of Facility: CAPITAL RESINS CORPORATION

Person to Contact: MICHAEL BLACK

Address: 324 DERING AVENUE
COLUMBUS, OH 43207

Location of proposed source(s): 324 DERING AVENUE
COLUMBUS, OHIO

Description of proposed source(s):
6,000 GALLON RESIN CHILL TANK W/AGITATOR, 2 TON/HOUR CORE SAND MIXER WITH WEIGH TANK.

Date of Issuance: January 21, 1998

Effective Date: January 21, 1998

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

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

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may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for CAPITAL RESINS CORPORATION located in Franklin 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P019	Core Wash Manufacturing (CW-2) with weigh tank and two day tanks	Bag splitter for Solids Charge vented to Dust Collector with No Visible Stack Emissions	3745-31-05 3745-17-07 3745-21-07 (G)	0.04 pound PM/hour, 0.16 ton PM/year, 0.01 pound OC/hour, 0.04 ton OC/year, See Additional Special Terms and Conditions
P020	Resin chill tank (RC-1) 6,000 gallon with agitator	Bottom fill, conservation vent, and residual content restriction	3745-31-05 3745-21-07 (G)	2.3 pounds OC/batch, 1.68 tons OC/year, 0.9 ton Methanol/year, 0.4 ton Formaldehyde/year, see Additional Special Terms and Conditions

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate Emissions	0.16
Organic Compounds	1.7
Formaldehyde	0.4
Methanol	0.9

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 OEPA Central District Office - DAPC, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Central District Office - DAPC, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall transfer phenolic resins batches with residual content not to exceed 7 percent formaldehyde and 8 percent methanol (by weight) to the resins chill tank (P020).
2. The permittee shall process not more than 121 batches per month nor more than 1450 batches per year of phenolic resins in the resins chill tank (P020).

B. Recordkeeping Requirements

1. The permittee shall maintain and operate the dust collector and pressure drop monitoring equipment for the core wash manufacturing bag splitter (P019) according to the manufacturer's specifications, instructions, and operating manual. The permittee shall monitor the pressure drop across the dust collector while the emissions unit is in operation.
2. The permittee shall analyze the formaldehyde and methanol content in each phenolic resin batch prior to transfer to the resin chill tank (P020). The permittee shall record the batch number, date, and the formaldehyde and methanol content of each phenolic resins batch processed in the resins chill tank (P020).
3. The permittee shall record the number of phenolic resins batches processed during each day that the resins chill tank is in operation. In addition, the permittee shall maintain a summation of the number of batches processed during each month and the previous rolling 12-month period, as determined during the first week of the following month.

These records, as well as any supporting analysis and computations, shall be retained in the companies files for a period of not less than three years, and shall be made available for review to the Director of the Ohio EPA, or any authorized representative, upon request.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the date, batch number, and the phenol and formaldehyde content of each resins batch transferred to the resins chill tank (P020) that exceeded the restriction in Additional Special Term and Condition A.1.
2. The permittee shall submit deviation (excursion) reports that identify each month, in which the monthly and/or annual batch processing restriction identified in Additional Special Term and Condition A.2 have been exceeded.

The permittee shall submit required reports in the following manner:

- a. except as otherwise noted in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, control device manufacturer's specifications and operating parameter restrictions that have been detected by the 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 Central District Office of Ohio EPA; and,
- b. 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 quarter. These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

D. Testing Requirements

1. Compliance with the emissions limitations specified in this permit shall be determined in accordance with the following methods:
 - a. limitation for particulate emissions from core wash manufacturing (P019):

0.04 pound particulate/hour;
0.16 ton particulate/year

Applicable Compliance Method

7,158 pounds (batch weight) * .75 (times the weight of each batch equals pounds of powder) * 1 ton/2,000 pounds * 0.54 pound PM/ton of powder = 1.45 pounds PM/batch * 1 batch/72 minutes * 60 minutes/1 hour

$$= 1.2 \text{ pounds PM/hour uncontrolled} * (1.0 - .97^{\frac{1}{2}}) = 0.04 \text{ pound PM/hour}$$

$$54,000,000 \text{ pounds (Maximum annual weight)} * .75 \text{ (times the weight of each batch equals pounds of powder)} * 1 \text{ ton}/2,000 \text{ pounds} * 0.54 \text{ pound PM/ton of powder} = 10,935 \text{ pounds PM uncontrolled} * (1.0 - 0.97)^{\frac{1}{2}} * 1 \text{ ton}/2,000 \text{ pounds} = 0.16 \text{ ton PM/year}$$

¹ .97 is 97 percent control efficiency

- b. limitation for organic compounds from core wash manufacturing (P019):

0.01 pound OC/hour
0.04 ton OC/year.

Applicable Compliance Method

BATCH ACT (USEPA 450/R-94-020, February 1994) spreadsheet calculation of vapor displacement emissions resulting from six transfer operations of organic fluids to weigh and day tanks. The emission rates of each step of the batch were summed to determine an hourly emission rate. (0.0108 pound OC/hour)

Annual organic compound emission rate is based on the hourly emission rate times 7300 batches/year.

- c. limitation for organic compounds from resin chill tank (P020):

2.3 pounds organic compounds/batch
1.7 tons organic compounds/year

Applicable Compliance Method

USEPA TANKS 3 calculation with volume input of 5,993 gallons of resins at 1,460 turnovers per year and 100 degrees Fahrenheit with residual content of 7 percent formaldehyde and 8 percent methanol.

Organic compounds batch emission rate based on annual emission rate of 3370 pounds OC/1460 batches/year = 2.3 pounds OC/batch.

Annual emission rate based on a throughput of 8,749,780 gallons per year. (3370 pounds OC/year * 1 ton/2000 pounds = 1.68 tons OC/year).

Annual formaldehyde emission rate is based on a 7 percent formaldehyde content processed at 100

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degrees Fahrenheit. (778.32 pounds/year * 1 ton/2000 pounds = 0.39 ton formaldehyde/year).

Annual methanol emission rate is based on an 8 percent methanol content processed at 100 degrees Fahrenheit. (1890 pounds/year * 1 ton/2,000 pounds = 0.94 ton methanol/year).