



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL ASHTABULA COUNTY** **CERTIFIED MAIL**

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: 02-13823**

**DATE: 5/17/00**

MFG Research Co  
John Wheeler  
1315 W 47th St  
Ashtabula, OH 44004

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 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, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 5/17/00

**FINAL PERMIT TO INSTALL 02-13823**

Application Number: 02-13823  
APS Premise Number: 0204010283  
Permit Fee: **\$200**  
Name of Facility: MFG Research Co  
Person to Contact: John Wheeler  
Address: 1315 W 47th St  
Ashtabula, OH 44004

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

**1315 W 47th St  
Ashtabula, Ohio**

Description of proposed emissions unit(s):

**Compression mold press #4 for fiberglass reinforced plastic parts.**

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



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.

**14. Construction Compliance Certification**

**MFG Research Co**  
**PTI Application: 02-13823**  
**Issued: 5/17/00**

**Facility ID: 0204010283**

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**

**Pollutant**

**Tons Per Year**

**OC**

**0.99**

**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>
P007 - Compression mold press #4 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See section A.2.a. below.
	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 5.4 lbs/day and 0.99 tons/year. See section A.2.b. below.

**2. Additional Terms and Conditions**

- 2.a The emission limits based on this applicable rule are less stringent than the limit specified in OAC rule 3745-31-05(A)(3).
- 2.b The OC emissions from the molding operations are comprised of styrene, a photochemically reactive material.

**B. Operational Restrictions**

None.

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

- 1. The permittee shall collect and record the following information for each day for this emissions unit:
  - i. The company identification for each mold compound, each wet mix and each preform employed.

- ii. The number of pounds of each mold compound employed.
- iii. The number of pounds of each wet mix and each preform employed.
- iv. The total organic compound emission rate for all mold compounds and all wet mixes/preforms employed, in pounds per day.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the organic compound emissions from the mold compounds and the wet mixes/preforms exceeded 5.4 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### E. Testing Requirements

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

- i. Emission Limitation: 5.4 lbs OC/day

Applicable Compliance Method:

Compliance shall be based on the following::

$$E_{OC} = [\text{summation of } (W_i_{MC}) \times EF] + \{\text{summation of } [(W_i_{WM}) + (W_i_{PF})] \times EF\}$$

where:

$E_{OC}$  = daily, OC emissions for all mold compounds and all wet mixes/preforms, in pounds per day.

$W_i_{MC}$  = the weight of mold compound "i" employed, in pounds per day.

$W_i_{WM}$  = the weight of wet mix "i" employed, in pounds per day.

$W_i_{PF}$  = the weight of preform "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold presses, which is 0.00134 pounds per pound of mold compound or wet mix/preform, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle".

- ii. Emission Limitation: 0.99 TPY OC

Applicable Compliance Method:

Determination of the annual OC emissions shall be the sum of the daily OC emission rates, as specified in section E.1.a., for the calendar year divided by 2000 lbs/ton.

- 2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

#### **F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13823 Facility ID: 0204010283

FACILITY NAME MFG Research Co

FACILITY DESCRIPTION Compression mold press #4 for fiberglass reinforced plastic parts. CITY/TWP Ashtabula

SIC CODE 3089 SCC CODE 3-08-007-20 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION Compression mold press #4 for fiberglass reinforced plastic parts

DATE INSTALLED 12/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM <sub>10</sub>	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment	0.54 lbs/day	0.29	5.4 lbs/day	0.99
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Air Toxics: Styrene	Unclassified	0.54 lbs/day	0.29	5.4 lbs/day	0.99

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** Since styrene emission factor is uncertain the allowable rate is based on a small rate that does not require dispersion modeling and will retain non-Title status for the facility.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$0 (not applicable)

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: Styrene emissions are &lt;1 TPY.

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13823

Facility ID: 0204010283

FACILITY NAME MFG Research Co

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FACILITY DESCRIPTION	Compression mold press #4 for fiberglass reinforced plastic parts.	CITY/TWP	Ashtabula
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**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13823 Facility ID: 0204010283

FACILITY NAME MFG Research Co

FACILITY DESCRIPTION Compression mold press #4 for fiberglass CITY/TWP Ashtabula  
reinforced plastic parts.

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and **electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)**

*Please fill out the following. If the checkbox does not work, replace it with an 'X'*

	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

[NSR Discussion](#)

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or  Netting Determination  
Permit To Install ENTER PTI NUMBER HERE

Source Description

Facility Emissions and Attainment Status

Source Emissions

Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13823

Facility ID: 0204010283

FACILITY NAME MFG Research Co

FACILITY DESCRIPTION	CITY/TWP
Compression mold press #4 for fiberglass reinforced plastic parts.	Ashtabula

**Pollutant****Tons Per Year**

OC

0.99