



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:

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

Re: Permit to Install
Stark County
Application No: 15-1262

CERTIFIED MAIL

March 19, 1997

U.S. CHEMICAL & PLASTICS
TOM SCHROETER
600 NOVA DRIVE, S.E.
MASSILLON, OH 44646

MAR 21 1997

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 Board of Review 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 Board of Review 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
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
CANTON AIR POLLUTION CONTROL

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



Permit to Install Terms and Conditions

Application No. 15-1262
APS Premise No. 1576131795
Permit Fee: \$400.00

Name of Facility: U.S. CHEMICAL & PLASTICS

Person to Contact: TOM SCHROETER

Address: 600 NOVA DRIVE, S.E.
MASSILLON, OH 44646

Location of proposed source(s): 600 NOVA DRIVE, S.E.
MASSILLON, OHIO

Description of proposed source(s):
HARDNER/ACTIVATOR MIXER AND CLEARCOAT MIXER.

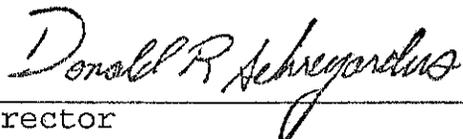
Date of Issuance: March 19, 1997

Effective Date: March 19, 1997

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 U.S. CHEMICAL & PLASTICS located in Stark 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>
P007	Clearcoat mixing	Compliance with 3745-21-07(G) (2)	3745-31-05 3745-21-07 (G) (2)	Emission limits 3.76 lbs OC/hr 39 lbs OC/day 3.76 tons OC/yr Mixing limitations 50 gallons/hr 518 gallons/ day 100,000 gallons/year
P008	Hardener/Activator mixing	Compliance with 3745-21-07(G) (2)	3745-31-05 3745-21-07 (G) (2)	Emission limits 4.16 lbs OC/hr 39 lbs OC/day 4.16 tons OC/yr Mixing limitations 68 gallons/hr 637 gallons/ day 136,000 gallons/year

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	7.92

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

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

AIR POLLUTION NUISANCES PROHIBITED

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

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

P007 CLEARCOAT MIXING

A. Control Measures and/or Usage Requirements:

None.

B. Operational and/or Production Limitations:

This emissions unit shall not mix more than the following amounts in the time period indicated:

1. 50 gallons in any one hour;
2. 518 gallons in any one day; and
3. 100,000 gallons in any one year, based upon a rolling, daily summation of amount of material mixed.

The above gallon limitations were based on an emission factor of 30 pounds OC emitted per ton of solvent mixed.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the mixing levels specified in the following table:

<u>Cumulative Month(s)</u>	<u>Maximum Allowable Mixing Amounts</u>
1	8,333
1-2	16,666
1-3	25,000
1-4	33,333
1-5	41,665
1-6	50,000
1-7	58,333
1-8	66,667
1-9	75,000
1-10	83,333
1-11	91,667
1-12	100,000

After the first 12 calendar months of operation, compliance with the annual mixing limitation shall be based upon a rolling, 365 day summation of the mixing figures.

C. Monitoring and/or Recordkeeping Requirements:

1. The permittee shall maintain daily records of the following information:
 - a. the amount of clearcoat mixed each day;

- b. beginning after the first 12 calendar months of operation, the rolling 365-day summation of the amount of clearcoat mixed;
- c. the total organic emission rate;
- d. the average hourly organic emission rate, in pounds per hour (average), to be reconciled on a monthly basis using actual production output data and raw material input usage; and
- e. documentation on whether or not the clearcoat mixed is a photochemically reactive material.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative amount of hardener/activator for each calendar month.

D. Reporting Requirements and Compliance Methods:

The permittee shall submit deviation (excursion) reports which include the following information:

1. an identification of each day during which the average hourly organic compound emission rate exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day;
2. an identification of each day during which the organic compound emission rate (from the mixing of hardener/activator) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day; and
3. an identification of all exceedances of the rolling, 365-day limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative mixing amount limits.

E. Testing Requirements and Compliance Methods:

Compliance with the emission limitation(s) in Air Emissions Summary and Section B of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation

3.76 lbs OC/hr

Applicable Compliance Method

this hourly emission rate shall not be exceeded as long as the average hourly amount of activator mixed does not exceed 50 gallons/hr (this gallon limitation was based on the emission factor of 30 lbs OC/ton of solvent mixed and the fact

Emission Limitation

Applicable Compliance Method

39 lbs OC/hr

that 64% of the clearcoat is solvent)

the total daily emission rate shall be determined by making sure that no more than 518 gallons of clearcoat is mixed each day (this gallon limitation was based on the emission factor of 30 lbs OC/ton of solvent mixed and the fact that 64% of the clearcoat is solvent)

3.76 tons OC/yr

compliance with this limit is shown by not mixing more than 100,000 gallons of clearcoat in any rolling 365-day period (this gallon limitation was based on the emission factor of 30 lbs OC/ton of solvent mixed and the fact that 64% of the clearcoat is solvent).

F. Miscellaneous:

None.

P008 HARDENER\ACTIVATOR MIXING

A. Control Measures and/or Usage Requirements:

None.

B. Operational and/or Production Limitations:

This emissions unit shall not mix more than the following amounts in the time period indicated:

1. 68 gallons in any one hour;
2. 637 gallons in any one day;
3. 136,000 gallons in any one year, based upon a rolling, daily summation of amount of material mixed.

The above gallon limitations were based on an emission factor of 30 pounds OC emitted per ton of solvent mixed.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the mixing levels specified in the following table:

<u>Cumulative Month(s)</u>	<u>Maximum Allowable Mixing Amounts</u>
1	11,333
1-2	22,667
1-3	34,000
1-4	45,333
1-5	56,667
1-6	68,000
1-7	79,333
1-8	90,667
1-9	102,000
1-10	113,333
1-11	124,667
1-12	136,000

After the first 12 calendar months of operation, compliance with the annual mixing limitation shall be based upon a rolling, 365-day summation of the mixing figures.

C. Monitoring and/or Recordkeeping Requirements:

1. The permittee shall maintain daily records of the following information:
 - a. the amount of hardener/activator mixed each day;
 - b. beginning after the first 12 calendar months of operation, the rolling 365-day summation of the amount of hardener/activator mixed;
 - c. the total organic emission rate;
 - d. the average hourly organic emission rate, in pounds per hour (average), to be reconciled on a monthly basis using actual production output data and raw material input usage; and
 - e. documentation on whether or not the hardener/activator mixed is a photochemically reactive material.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative amount of hardener/activator for each calendar month.

D. Reporting Requirements:

The permittee shall submit deviation (excursion) reports which include the following information:

1. an identification of each day during which the average hourly organic compound emission rate exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day;

2. an identification of each day during which the organic compound emission rate (from the mixing of hardener/activator) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day; and
3. an identification of all exceedances of the rolling, 365-day limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative mixing amount limits.

E. Testing Requirements and Compliance Methods:

Compliance with the emission limitation(s) in Air Emissions Summary and Section B of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation

Applicable Compliance Method

4.16 lbs OC/hr

this hourly emission rate shall not be exceeded as long as the average hourly amount of hardener/activator mixed does not exceed 68 gallons/hr (this gallon limitation was based on the emission factor of 30 lbs OC/ton of solvent mixed and the fact that 50% of the hardener/activator is solvent)

39 lbs OC/hr

the total daily emission rate shall be determined by making sure that no more than 637 gallons of hardener/activator is mixed each day (this gallon limitation was based on the emission factor of 30 lbs OC/ton of solvent mixed and the fact that 50% of the hardener/activator is solvent)

4.16 tons OC/yr

compliance with this limit is shown by not mixing more than 136,000 gallons of clearcoat in any rolling 365-day period (this gallon limitation was based on the emission factor of 30 lbs OC/ton of solvent mixed and the fact that 50% of the hardener/activator is solvent.

F. Miscellaneous:

None.