



State of Ohio Environmental Protection Agency

NOV 18 1997

OHIO EPA NEDQ

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
Ashtabula County
Application No: 02-1349
TOXIC REVIEW

CERTIFIED MAIL

November 12, 1997

PICKENS PLASTICS INC. - JEFFERSON PLANT
WELLA VANCE
149 SOUTH CUCUMBER STREET
JEFFERSON, OH 44047

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
NORTHEAST DISTRICT OFFICE, DAPC
ASHTABULA HEALTH DEPARTMENT

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



Permit to Install Terms and Conditions

Application No. 02-1349
APS Premise No. 0204000423.
Permit Fee: \$3600.00

Name of Facility: PICKENS PLASTICS INC. - JEFFERSON PLANT

Person to Contact: WELLA VANCE

Address: 149 SOUTH CUCUMBER STREET
JEFFERSON, OH 44047

Location of proposed source(s): 149 SOUTH CUCUMBER STREET
JEFFERSON, OHIO

Description of proposed source(s):
GELCOAT AND CHOP/MAT LAYUP BOOTHS #1, #2, #3, #4, #5, #6, TO
OLING GELCOAT BOOTH #7, PAINT SPRAY BOOTHS #8, #9.

Date of Issuance: November 12, 1997

Effective Date: November 12, 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

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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)

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 PICKENS PLASTICS INC. - JEFFERSON PLANT located in Ashtabula 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>
R001	Polyester resin spray booth	Compliance with 3745-21-07 (G) (2) Use non-photochemically reactive solvents as the clean-up material	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day and 7.3 TPY of OC from spray/gelcoat operations. Clean-up material shall be limited to 396 gallons/yr
R002	Polyester resin spray booth	Compliance with 3745-21-07 (G) (2) Use non-photochemically reactive solvents for clean-up	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day and 7.3 TPY of organic compound from spray/gelcoat operations. Clean-up material shall be limited to 396 gallons/yr
R003	Polyester resin spray booth	Compliance with 3745-21-07 (G) (2) Use non-photochemically reactive clean-up solvents	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day and 7.3 TPY of organic compound from gelcoat/spray operations. Clean-up material shall be limited to 396 gallons/yr

<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>
R004	Polyester resin spray booth	Compliance with 3745-21-07 (G) (2) Use of non-photochemically reactive clean-up solvents	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day, 7.3 TPY of organic compounds from spray/gelcoat Clean-up material shall be limited to 396 gallons/yr
R005	Polyester resin spray booth	Compliance with 3745-21-07 (G) (2) Use of non-photochemically reactive cleanup solvent	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day, 7.3 TPY of organic compounds from spray/gelcoat Clean-up material shall be limited to 396 gallons/yr
R006	Polyester resin spray booth	Compliance with 3745-21-07 (G) (2) Use non-photochemically reactive clean-up solvents	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day, 7.3 TPY of organic compounds from spray/gelcoat Clean-up material shall be limited to 396 gallons/yr
R007	Gel coat tool mix to wood molds	Compliance with 3745-21-07 (G) (2) Use non-photochemically reactive clean-up solvents	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day, 7.3 TPY of organic compounds from spray/gelcoat Clean-up material shall be limited to 396 gallons/yr
R008	Paint spray booth	Compliance with 3745-21-07 (G) (2)	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day, 7.3 TPY of organic compounds from

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		Use non-photochemically reactive clean-up solvents		spray booth Clean-up material shall be limited to 396 gallons/yr
R009	Paint spray booth	Compliance with 3745-21-07 (G) (2) Use non-photochemically reactive clean-up solvents	3745-31-05 3745-21-07 (G) (2)	8 lbs/hr, 40 lbs/day, 7.3 TPY of organic compounds from spray booth Clean-up material shall be limited to 396 gallons/yr

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic compounds	77.49

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 Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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 Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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. The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for these sources:

OAC Rule 3745-31-05
OAC Rule 3745-21-07(G)

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

- B. The emissions unit covered by this Permit to Install include: Gelcoat and Chop/Mat Layup Booths No. 1, (R001); No. 2, (R002); No. 3, (R003); No. 4 (R004); No. 5, (R005); and No. 6 (R006). Tooling Gelcoat (R007); and Paint Spray Booths (R008) and (R009).
- C. No clean-up material employed in this emissions unit shall be a photochemically reactive material as defined in OAC Rule 3745-21-01(C)(5).

D. The permittee shall collect and record the following information for each day for the coating operation:

1. the company identification for each coating and cleanup material employed;
2. the number of gallons of each coating and cleanup material employed;
3. the organic compound of each coating and cleanup material, in pounds per gallon;
4. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
5. the total number of hours the emissions unit was in operation; and,
6. the average hourly organic emission rate for all coatings and cleanup material, i.e., (4)/(5), in pounds per hour (average).

[Note: The coating information must be for coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC Rule 3745-21-01(C) (5).]

E. The permittee shall collect and record the following information for the purpose of determining annual organic compound emissions:

1. the company identification for each nonphotochemically reactive cleanup material employed;
2. the number of gallons of each nonphotochemically reactive cleanup material employed;
3. the organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon; and,
4. the total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds.

F. These records, as well as any supporting analyses and computations, shall be retained in the company's files for a period of not less than three years and shall be made available to the Director, or any authorized representative of the Director for review during normal business hours.

G. 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 emissions from the coatings

exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

2. an identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
- H. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 02-1349. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Styrene

TLV (ug/m³): ~~5070~~ 212,940

Maximum Hourly Emission Rate (pounds/hour): 4.71

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 3360

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): ~~5070~~

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Northeast District Office is required, including the possible issuance of modifications to PTI number 02-1349 and the operating permit:

1. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
2. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
3. any change to the emissions unit or its method of operation that would either require an increase in the

emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

4. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic 3745-21-01(B) (6); and,
5. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-17-01(V).

I. Applicable Compliance Method

1. Compliance with the daily and annual OC emission limitations for both the facility and the individual emissions units shall be determined based on a compilation of daily and annual operating data recorded and reported for each emissions unit.

$$(a) E_{\text{daily}} = [(G_1) \times (D_1) \times (P_1)] + [(G_2) \times (D_2) \times (P_2)] + \dots + [(G_x) \times (D_x) \times (P_x)] \text{ and}$$

$$(b) E_{\text{annual}} = E_{\text{daily}} \times Y$$

$$(c) E_{\text{hourly}} = E_{\text{daily}}/H$$

Where:

E_{daily} = the daily emission of OC from either the entire facility or from a specific emissions unit.

$G_1, G_2, \text{ etc.}$ = the gallons per day of a coating(s) or clean-up material used in the facility or a specific emissions unit.

$D_1, D_2, \text{ etc.}$ = the density, in pounds per gallon, of the respective coating(s) or clean-up material used.

$P_1, P_2, \text{ etc.}$ = the total weight percent of all OCs in the specific coatings(s) or clean-up material used as determined from the manufacturer's formulation data (MSDS) or by analysis using ASTM methods specified in U.S. EPA Method 24 (OC).

E_{annual} = annual emissions of OC from either the facility or the specific emissions unit.

E_{daily} = daily emission of OC from the emissions unit.

Y = total operating days per year for the facility of emissions unit.

H = total operating hours per day for the emissions unit.

100

100