



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-7882**

CERTIFIED MAIL

DATE: August 25, 1999

Capital Resin Corporation
Todd A Trowbridge
324 Dering Avenue
Columbus, OH 43207

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 **\$1600** 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,

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

cc: USEPA
DAPC, CDO
Mid-Ohio Regional Planning Commission

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

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 01-7882

Application Number: 01-7882
APS Premise Number: 0125040238
Permit Fee: **To be entered upon final issuance**
Name of Facility: Capital Resin Corporation
Person to Contact: Todd A Trowbridge
Address: 324 Dering Avenue
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
**324 Dering Avenue
Columbus, Ohio**

Description of proposed emissions unit(s):
**POLLUTION PREVENTION PROJECT FOR SOLID PARAFORMALDEHYDE FEED SYSTEM TO
TWO RESIN REACTORS.**

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

Capital Resin Corporation

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Facility ID: 0125040238

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

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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

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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

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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.

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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>
Formaldehyde	0.72

PART II: SPECIAL TERMS AND CONDITIONS [Continued]

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>
Solid Paraformaldehyde Handling System w/ bulk bag unloading, two receiver bins and vacuum conveying system with cartridge filter	OAC rule 3745-31-05(A)(3)	Formaldehyde emissions shall not exceed 3.6 lb per hour and 0.72 ton per year. See A.2.b. and A.2.c. below.
	OAC rule 3745-31-05(D)	See A.2.a. below.
	OAC rule 3745-21-07(G)(2)	Less stringent than the hourly allowable limit above.

2. Additional Terms and Conditions

- 2.a The facility-wide individual and combined hazardous air pollutant (HAP) emissions shall not exceed 10 tons and 25 tons per rolling 12-month period, respectively, by limiting the total HAP emissions from all emissions units. To date this would include J001, P004, P006, P010, P013, P014, P016, P018, P020, P022, P025, T048, T051, T052, T054, and T055.
- 2.b The final cartridge filter shall achieve 99% control of paraformaldehyde emissions during use of the pneumatic conveying system. (Paraformaldehyde sublimates to formaldehyde vapors in the pneumatic system)
- 2.c The 3.6 lb formaldehyde/hr limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

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1. The pressure drop across the final cartridge filter shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.
2. The permittee shall not charge more than 4,000 lb of solid paraformaldehyde per batch during the production of solid paraformaldehyde-based resin.
3. The permittee shall produce not more than sixty-seven (67) batches of solid paraformaldehyde-based resin during any monthly period during the initial twelve month period following issuance of this permit. The permittee shall not produce more than eight hundred (800) batches of solid paraformaldehyde-based resins during any subsequent rolling twelve-month period.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the final cartridge filter, while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the final cartridge filter on a daily basis while the emissions unit is in operation.
2. The permittee shall maintain the following records on a monthly basis for the solid paraformaldehyde handling system to be completed during the first week of the following month:
 - a. any batch of solid paraformaldehyde-based resin produced using more than 4,000 lbs of solid paraformaldehyde;
 - b. the total number of solid paraformaldehyde-based resin batches produced during each month; and,
 - c. a summation of the total number of solid paraformaldehyde-based resin batches produced during the rolling twelve-month period.
3. The permittee shall maintain a record of the rolling twelve-month individual and combined hazardous air pollutant facility-wide emissions on a monthly basis to be completed during the first week of each month.

D. Reporting Requirements

1. In accordance with paragraph A.2.b. of the General Terms and Conditions, the permittee shall

submit quarterly deviation(excursion) reports for the following:

- a. all exceedences during which the pressure drop across the final filter did not comply with the allowable range specified in restriction B.1., above, and any actions taken to return the pressure drop to a compliant operating range;
- b. any exceedence of the 4,000 lb weight restriction per batch of solid paraformaldehyde-based resin production listed in B.2., above;
- c. all exceedences of the rolling twelve-month production limitation on the solid paraformaldehyde system listed in B.3., above, and,
- d. all exceedences of the rolling, 12-month facility-wide emission limitation for single and combined hazardous air pollutants.

E. Testing Requirements

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

- a. Emission Limitation:

3.6 lb formaldehyde/hour

Applicable Compliance Method:

The batch emission rate is calculated from both a PM10 component in the 4,000 lbs paraformaldehyde charged and a sublimated component in the 11,333 cubic feet of air conveyed during a 30-minute period. The particulate component assumes that 0.01% of the weight is PM10 capable of passing through the cartridge filter plus a vapor component that sublimates at a vacuum according to equation 3-7 from the USEPA Batch Act Document EPA 450/R-94-020. The hourly emission rate is based on emission calculations for two batches charged per hour.

$4,000 \text{ lbs formaldehyde/batch} * (1 - 0.9999) = 0.4 \text{ lb formaldehyde from filter}$

$11,333 \text{ cubic feet of air/batch} * 30.06 \text{ lb formaldehyde/lb mole} * 0.00486056 \text{ mole formaldehyde/mole air} * 0.33 \text{ atm} / (1.3114 \text{ atm ft}^3/\text{lbmolK} * 305 \text{ K}) = 1.37 \text{ lb formaldehyde /batch.}$

$1.37 \text{ lb vapor} + 0.4 \text{ lb from filter} = 1.8 \text{ lb formaldehyde} * 2 \text{ batch/hr} = 3.6 \text{ lb}$

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formaldehyde/hr

b. Emission Limitation:

0.72 ton formaldehyde/year

Applicable Compliance Method:

The annual emission rate is calculated from 1.8 lb formaldehyde/batch times the number of batches produced per year.

$1.8 \text{ lb formaldehyde} * 800 \text{ batches/yr} * 1 \text{ ton}/2,000 \text{ lbs} = 0.72 \text{ ton formaldehyde/yr}$

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F. Miscellaneous Requirements

1. Air Toxic Policy Clarifying Language

Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.