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Facility Name: **Zehrc**o Plastics Inc, Plant No. 2

Application Number: 02-2552

Date: **December 21, 1998**

GENERAL PERMIT CONDITIONS

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

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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.

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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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Zehrco Plastics Inc, Plant No. 2** located in **Ashtabula** County. The emissions units 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	Cowles Mixer No. 2, sheet molding compound (SMC) mixing operation with a maximum production capacity of 1,100 pounds per hour	Technology applied and compliance with listed rules and Ohio Air Toxics Policy.	3745-31-05 3745-21-07 (G)	Process Emissions: 2.42 pounds/hour 40.0 pounds/day and 7.3 tons/year photochemically reactive organic compounds. Clean-up Emissions: 19.8 pounds/day and 3.61 tons/year of organic compounds

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds	7.3 (Photochemically reactive)
	3.61 (Exempt)

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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 **Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, OH 44087.**

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 **Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, OH 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.

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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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall not employ any cleanup solvents in this emissions unit that are photochemically reactive materials, as defined in OAC rule 3745-21-01.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the SMC Machine operation:
 - a. the number of pounds of each SMC paste material employed;
 - b. the organic compound content of each SMC paste, in percent, by weight;
 - c. the total organic compound emission rate from the operation of the SMC machine, in pounds per day;
 - d. the total number of hours the emissions unit was in operation; and,
 - e. the average hourly organic compound emission rate from the operation of the SMC machine, i.e., c/d, in pounds per hour (average).

[Note: The SMC paste information must be for the SMC paste as employed, including any thinning solvents or styrene monomer added at the emissions unit.]

2. The permittee shall collect and record the following information for each day for the SMC mixing operation:

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- a. the company identification of each cleanup solvent employed;
- b. the number of hours the mixer was cleaned per day; and,
- c. the total organic compound emission rate from the mixer cleanup operation, in pounds per day.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from SMC material mixing operation exceeded 2.42 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,
 - b. an identification of each day during which the organic compound emissions from the SMC material mixing operation exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify each day during which the organic compound emissions from the mixer cleanup operation exceeded 19.8 pounds per day, and the actual organic compound emissions for each such day.

The permittee shall also submit annual reports which specify the total organic compound emissions from the mixer cleanup operation for the previous calendar year. These reports shall be submitted by January 31 of each year.

D. Testing Requirements

1. Compliance with the process emission limitations of 2.42 lbs per hour and 40.0 lbs per day shall be determined in accordance with the following methods:

The total organic compound emission rate shall be determined by multiplying the total weight of SMC material employed per day by the organic compound content of the material mixed, by weight, and then multiplying by the 2.0 percent emission factor. (The 2.0 percent emission factor is from AP-42 Section 6.4.1 and is for solvent evaporative losses from paint manufacturing, the most analogous process for which there is a

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published emission factor).

Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the SMC materials.

2. Compliance with the cleanup emission limitation 19.8 lbs/day in Section B.I. of these terms and conditions shall be determined in accordance with the following methods:

The total organic compound emission rate shall be determined by multiplying Zehrco's emission factor of 1.2 lbs per hour of evaporative emissions resulting from mixer cleanup by the number of hours per day that cleanup operations occurred.

Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the mixer cleanup solvent materials.

E. Miscellaneous Requirements

1. This permit allows the use of the SMC formulations and cleanup materials specified by the permittee in the application for PTI number 02-2552. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the SMC 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 the pollutant with the most stringent TLV based on the SCREEN3 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 that pollutant:

Pollutant: Styrene

TLV: 50 PPM

Maximum Hourly Emission Rate (lbs/hr): 2.42 lbs/hour/emissions unit

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline: 0.09 PPM

Maximum Acceptable Ground-Level Concentration (MAGLC): 1.19 PPM

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Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northeast District Office are required, including the possible issuance of modifications to PTI number 02-2552 and the operating permit:

- a. any changes in the composition of the SMC or cleanup materials, or the use of new SMC formulation 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;
- b. 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; and,
- c. 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.