



State of Ohio Environmental Protection Agency

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RE: PERMIT TO INSTALL MODIFICATION
ASHTABULA COUNTY
Application No: 02-11547

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 9/21/2000

MFG Premier Molding Company
Matthew Narducci
PO Box 1000 4401 Benefit Ave
Ashtabula, OH 44003

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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



ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-11547

Application Number: **02-11547**

APS Premise Number: **0204010173**

Permit Fee: **\$200**

Name of Facility: **MFG Premier Molding Company**

Person to Contact: **Matthew Narducci**

Address: **PO Box 1000 4401 Benefit Ave
Ashtabula, OH 44003**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4401 Benefit Ave
Ashtabula, OHIO**

Description of modification:

Modification of PTI 02-1547, issued 10/22/97, to increase OC, NO_x, CO & PM limits due to revised emission factors & inclusion of PM emissions from the spray-up operation at P013.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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 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 emissions units listed below comprise the Permit to Install for **MFG Premier Molding Company** 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>
P013	120" Preform/oven	Use of non-photochemically reactive binder solution. Use of natural gas as the fuel.	3745-31-05 3745-17-07(A) 3745-17-11 3745-21-07(G)(1) 3745-21-08 3745-23-06	Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule. 1.83 lbs/hr from the spray-up operation. 8.54 TPY of total PM emissions from fuel combustion and spray-up. 6.9 lbs/day from binder usage at spray-up; 3 lbs/hr and 15 lbs/day from binder usage at the oven; and 4.31 TPY from all operations of OC emissions. 0.49 lb/hr and 2.15 TPY of CO emissions from fuel combustion at the oven. 0.58 lb/hr and 2.54 TPY of NO _x emissions from fuel combustion at the oven.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	8.54
OC	4.31
CO	2.51
NO _x	2.54

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 Environmental Protection Agency Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 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 Environmental Protection Agency 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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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. Introduction

The company manufactures fiber glass reinforced plastic parts. This permit is for one preform/oven (P013).

B. Emission Limitations

1. The emissions from emissions unit P013 shall not exceed the following limits:
 - a. 6.9 pounds/day of organic compound (OC) emissions from binder usage at the spray-up operation;
 - b. 3 pounds/hour and 15 pounds/day of OC emissions from binder usage at the oven operation;
 - c. 4.31 TPY of OC emissions from all operations, including emissions from combustion of fuel;
 - d. 1.83 lbs/hr of PM emissions from the spray-up operation. 8.54 TPY of total PM emissions from spray-up and fuel combustion;
 - e. 0.58 lb/hr and 2.54 TPY of nitrogen oxide compounds (NO_x) emissions; and,
 - f. 0.49 lb/hr and 2.15 TPY of carbon monoxide (CO) emissions.

C. Operational Restrictions

1. Only non-photochemically reactive materials shall be employed.
2. Natural gas shall be employed as the fuel in a burner with a rated capacity of no more than 6 MMBtu/hour.

3. This permit allows for the use of the materials specified by the permittee in the application for a Permit to Install. In conjunction with the best available technology requirements of OAC Rule 3745-31-05, the OC emission limitations specified in this permit are based on both the formulation data of the materials and the design parameters of the emissions units' exhaust system(s), as specified in the application.

Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the Ohio EPA are required:

- a. any change to the emissions unit(s) or its method of operation that would either require an increase in the emission limitations(s) established by this permit or would otherwise be considered a "modification" as defined in OAC Rule 3745-31-01.

D. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day:
 - a. the company identification for each binder solution employed;
 - b. the number of pounds of each binder solution employed;
 - c. the organic compound content of each binder solution, in percent by weight;
 - d. the total available (prior to applying the spray-up/oven "split") daily organic compound emission rate for all binder solutions, in pounds per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total organic compound emission rate for all binder solutions at the spray-up operation (after applying the spray-up/oven "split"), in pounds per day;
 - g. the total organic compound emission rate for all binder solutions at the oven operation (after applying the spray-up/oven "split"), in pounds per day; and,
 - h. the average hourly organic compound emission rate for all binder solutions at the oven operations, i.e., (g)/(e), in pounds per hour (average).

E. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Ohio EPA Northeast District Office which identify all exceedances. The reports shall include the following information:

- a. statement(s) noting the allowable limit(s) as specified in term B;
- b. an identification of each day during which the total organic compound emissions from the spray-up operation exceeded 6.9 pounds per day, and the actual organic compound emissions from the spray-up operation for each such day;
- c. an identification of each day during which the total organic compound emissions from the oven operation exceeded 15 pounds per day, and the actual organic compound emissions from the spray-up operation for each such day;
- d. an identification of each day during which the average hourly organic compound emission rate from the oven operation exceeded 3 pounds per hour, and the actual average hourly organic compound emission rate from the oven for each such day; and,
- e. a description of any corrective actions taken to address any exceedance of any emission limitation.

The excursion 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC Rule 3745-15-06).

2. The permittee shall submit annual reports to the Ohio EPA Northeast District Office which include the following information:
 - a. the total organic compound emissions from each emissions unit for the previous calendar year in tons per year.

These reports shall be submitted by April 15 of each year.

F. Testing Requirements

1. For purposes of calculating the organic compound emission rates for the oven operation and each associated spray-up operation, the permittee shall utilize a value of 32 percent as the maximum percentage of the organic compounds employed in the spray-up operation that are emitted uncontrolled from the spray-up operation. The remaining 68 percent of the organic compounds employed in the spray-up operation shall be considered to be the uncontrolled emissions for the oven

operation. This “split” of organic compound emissions between the oven operation and the associated spray-up operation is based upon in house testing, conducted on October 18, 1994, on a similar emissions unit, (P027) 128" Preform/Oven at Plant 2 (0204010230).

2. To calculate organic compound emissions from spray up and oven operations for purposes of determining compliance with the applicable emission limitations of this permit, the permittee shall employ the following:

- a. determination of total, available, daily organic compound content for all binder solutions:

$$\Sigma AOE = \Sigma (W_i \times OC_i)$$

ΣAOE = the total, available, daily organic compound content for all binder solutions, in pounds

W_i = the weight of binder solution "a" employed, in pounds per day

OC_i = the volatile organic compound content of binder solution "a", in percent by weight; and,

- b. to calculate emissions from spray-up or oven operations for purposes of determining compliance with the daily organic compound emission limitations of this permit, the permittee shall employ the following:

$$E = \Sigma AOE \times SR$$

E = total, daily, organic compound emissions, in pounds per day

SR = split ratio. 0.32 for spray-up operations and 0.68 for oven operations.

3. 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).

G. Miscellaneous Requirements

None.