

INSTRUCTIONS: Permit-by-Rule Supplemental Form Resin Injection/Compression Molding

GENERAL INSTRUCTIONS:

Provide complete responses to all applicable questions. Submittal of an incomplete form will delay review and processing. If you need assistance, contact your Ohio EPA District Office or Local Air Agency for assistance. Contact the Ohio EPA, Division of Air Pollution Control at (614) 644-2270 for more information on contacting your local district office or go to <http://www.epa.ohio.gov/dapc> and select the topic "District Offices and Local Air Agencies". For more information on the permit-by-rule process, including online tracking of your notification form, go to <http://www.epa.ohio.gov/dapc/pbr/permitbyrule.aspx>

This is a notification form for equipment used for injection and compression molding of resins which is intended to be installed and/or operated according to the permit-by-rule provisions of OAC 3745-31-03(A)(4)(a) and (c). This permit-by-rule provision is intended to cover all compression and injection molding machines at a facility but does not cover other types of air pollution sources at the facility such as boilers, paint booths, etc. which may require air pollution permits. Equipment used for injection molding of resins where no more than one million pounds of resins (thermoplastic or thermosetting) per rolling 12-month period are used in injection molding machines at the facility is exempt from permit-to-install requirements by OAC 3745-31-03(A)(1)(k). Compression molding presses used for the curing of plastic products that qualify for the de minimis exemption under OAC 3745-15-05 are exempt from permit-to-install requirements by OAC 3745-31-03(A)(1)(m). For copies of these regulations, contact your Ohio EPA District Office or Local Air Agency. State regulations may also be viewed and downloaded from the Ohio EPA website at <http://www.epa.ohio.gov/dapc/regs/regs.aspx>

- I. Check the appropriate box to indicate which qualifying option you are requesting based on resin type and actual/projected production data. Under Option 1, resin usage amounts should reflect the total weight of all thermoplastic or thermoset resins combined. The reference to "1000 pounds of volatile organic compounds (VOC) in external mold release agents..." refers to the total weight of VOC contained in all mold release agents and flattening spray used at the facility. For example, 100 pounds of a mold release agent which contains 20% VOC by weight contributes 20 pounds of VOC towards the 1000 pounds of VOC qualifying criterion. Consult the product Material Safety Data Sheet (MSDS) or contact the supplier for material VOC content. If your facility uses both thermoset and thermoplastic resins, use Option 2.

Under Option 2, the facility must calculate total VOC emissions including VOC from all injection/compression molding machines, mold release agents, and flattening spray used at the facility using emission factors and/or methodology approved by the Ohio EPA. Contact your District Office or Local Air Agency for further information about emission calculations. These calculations must be kept at your facility and be made available to the Ohio EPA upon request.

If your operations are not eligible for the PBR or other exemptions, please complete a permit-to-install application (forms are available at <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx> under "Permits (Permit to Install and Permit to Operate)", or continue to operate in accordance with your existing permits if the operation has been previously permitted.

Signature Requirements – This notification will be deemed incomplete if it is not signed by the appropriate signatory. Please see the following guidance at http://www.epa.ohio.gov/portals/27/title_v/respoff.pdf for more information on who is authorized to sign this form or contact your Ohio EPA District Office or Local Air Agency.

Permit-by-Rule Requirements: Resin Injection/Compression Molding

Excerpts from applicable sections of Ohio Administrative Code 3745-31-03(A)(4) are included with these Instructions for convenience. An owner or operator of equipment used for injection and compression molding of resins which intends to install and/or operate according to the permit-by-rule provisions must comply with all applicable requirements specified in paragraphs (A)(4)(a) – General Provisions, and (A)(4)(c) – Equipment used for injection and compression molding of resins.

(4) Permit-by-rule exemptions

The following air contaminant sources are exempt from the requirement to obtain a permit to install. These exemptions are valid only as long as the owner or operator complies with all of the permit-by-rule general provisions, meets the qualifying criteria defined in the applicable permit-by-rule and complies with all of the requirements under the applicable permit-by-rule specific provisions. Upon request by the director, the owner or operator of a facility that has exceeded the permit-by-rule thresholds or that the director finds is causing or may cause a public nuisance in violation of rule 3745-15-07 of the Administrative Code shall submit an application for a permit to install.

These exemptions do not, however, exempt any air contaminant source from requirements of the federal Clean Air Act, including being considered for purposes of determining whether a facility constitutes a major source or is otherwise regulated under Chapter 3745-77 of the Administrative Code or any requirement to list insignificant activities and emission levels in a Title V permit application. In addition, this rule does not relieve the owner or operator from the requirement of including the emissions associated with the exempt sources into any major new source review permitting action.

(a) General provisions

These general provisions apply to all owner or operators who are utilizing one or more of the permit-by-rule exemptions listed in paragraphs (A)(4)(b) through (A)(4)(l).

(i) Recordkeeping requirements

The owner or operator shall collect and maintain the records described for each air contaminant source exempted under paragraph (A)(4) of this rule and these records shall be retained in the owner or operator's files for a period of not less than five years, unless otherwise specified in each exemption. These records shall be made available to the director or any authorized representative of the director for review during normal business hours.

(ii) Notification requirements for new installations

For the purposes of this paragraph, a new permit-by-rule air contaminant source is an air contaminant source installed after the promulgation date of any new applicable permit-by-rule or July 29, 2005, whichever comes later. The owner or operator of a new permit-by-rule air contaminant source electing to use an applicable permit-by-rule exemption shall submit a written notification in a form and manner prescribed by the director prior to installation of the air contaminant source. This notification, or form, shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency, and shall contain the following information:

- (a) The owner or operator's and the facility contact's name;
- (b) The facility mailing address and telephone number;
- (c) The location of the air contaminant source(s);
- (d) A description of the air contaminant source, including any pollution control(s); and
- (e) A statement by the owner or operator that indicates which permit-by-rule applies to the air contaminant source.

(iii) Notification requirements for existing permitted sources

The owner or operator of an air contaminant source which is operating under an existing permit to install and/or permit to operate may continue to operate in compliance with that permit or may submit a written request to the Ohio EPA to revoke any such individual permit or permits and to allow the air contaminant source to operate under the permit-by-rule provisions. The director may revoke a permit to install and/or permit to operate if the permittee requests revocation, agrees to meet all permit-by-rule qualifying and operating conditions, and the director determines that the revocation will not result in the violation of any applicable laws. When a permittee requests a revocation pursuant to this paragraph, the director, without prior hearing, shall make a final determination on the request and inform the permittee in writing. If the director agrees with the request to operate under the permit-by-rule, then the permit-by-rule becomes applicable to the permittee on the date the existing permit to install and/or permit to operate are revoked.

(iv) Notification requirements for existing permit-by-rule sources

The owner or operator of an air contaminant source that is operating under one of the permit-by-rules that existed prior to July 29, 2005 (emergency electrical generators, injection and compression molding, crushing and screening plants, soil-vapor extraction and soil-liquid extraction) and desires to continue operating under the permit-by-rule shall submit a written notification which contains all of the elements required in paragraph (A)(4)(a)(ii) of this rule. This notification shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency and shall be submitted by July 29, 2006.

(v) Records retention requirements

Each record of any monitoring data, testing data, and support information required pursuant to a specific permit-by-rule 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 the specific permit-by-rule. Such records may be maintained in computerized form.

(vi) Reporting requirements

The owner or operator shall submit required reports in the following manner:

- (a) Reports of any monitoring and/or record keeping information required by a specific permit-by-rule shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency.
- (b) Except as otherwise may be provided in a permit-by-rule specific reporting requirements paragraph of a specific permit-by-rule, a written report of any deviations (excursions) from emission limitations, operational restrictions, qualifying

criteria, and control equipment operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in the permit-by-rule shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency within thirty days of the date the deviation occurred. The report shall describe the specific limitation and/or operational restriction exceeded, the probable cause of such deviation, and any corrective actions or preventive measures that have been or will be taken.

(vii) Scheduled maintenance/malfunction reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of rule 3745-15-06 of the Administrative Code. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio environmental protection agency district office or local air agency in accordance with paragraph (B) of rule 3745-15-06 of the Administrative Code. 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 served by such control system(s).

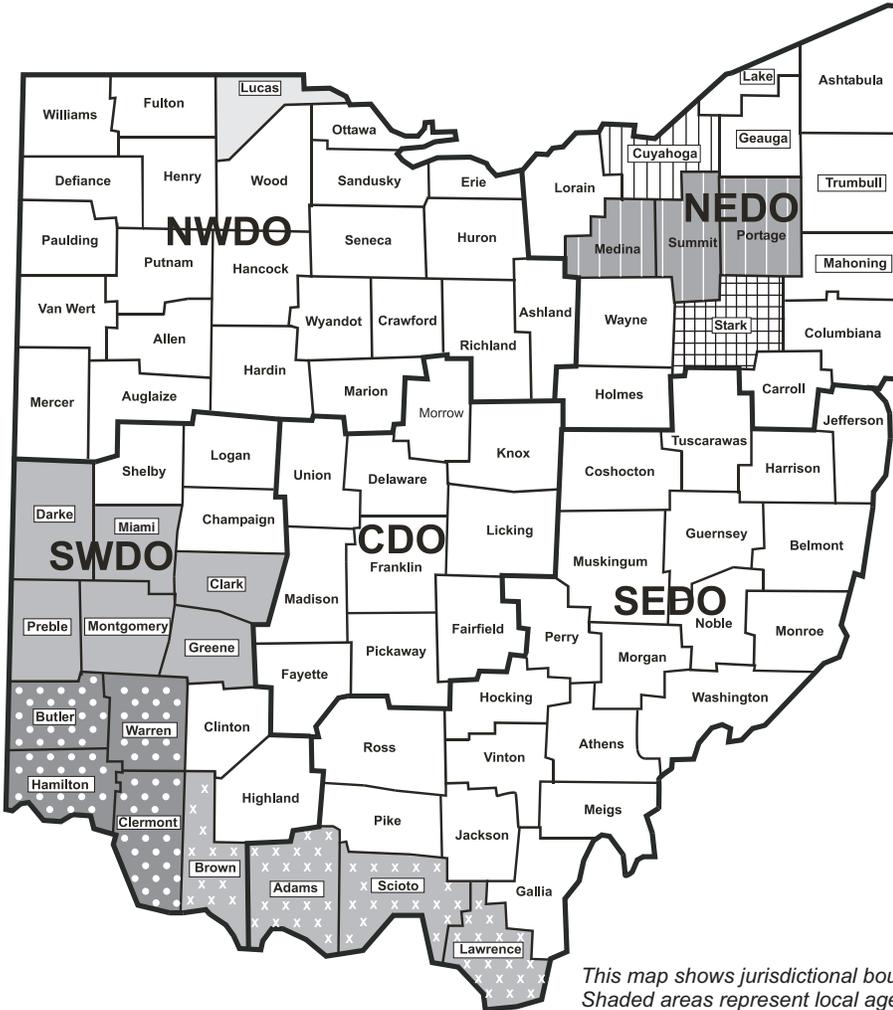
Note: Paragraph (b) is not included since it does not apply to the resin molding PBR

(c) Equipment used for injection and compression molding of resins where:

- (i) The facility does not qualify for the exemption under paragraph (A)(1)(k) or (A)(1)(m) of this rule; and
- (ii) The facility uses no more than one thousand pounds of VOC in external mold release agents and flatting spray per rolling twelve-month period; and
 - (a) The facility uses no thermoset resins and no more than six million pounds of thermoplastic resins (e.g., polyethylene, polypropylene, polycarbonate, and polyvinyl chloride, etc.) per rolling twelve-month period in injection machines at the facility (this type of molding operation involves materials that soften and melt upon heating or pressurization heating with no chemical change and no permanent change in physical properties. It does not involve curing, thermosetting or cross-linking.); or
 - (b) The facility uses no thermoplastic resins and no more than five hundred thousand pounds of thermoset resins (e.g., polyesters, polyurethanes, epoxy resins, etc.) per rolling twelve-month period in injection and compression molding machines at the facility (these types of molding operations use a thermoset resin and involve a chemical reaction, usually involving heat, that converts the material (e.g., polyesters, polyurethanes, epoxy resins, etc.) to a solid, insoluble state using a hardening or curing operation.); or
- (iii) No more than three tons of VOCs per rolling twelve-month period are emitted from injection and compression molding machines at the facility, including VOCs emitted as calculated by using emission factors approved by the Ohio environmental protection agency; and
- (iv) The facility maintains monthly records that contain the rolling twelve-month usage of thermoplastic resins, thermosetting resins and VOCs in external mold release agents and flatting spray used in all injection and compression molding machines at the facility, and the Ohio environmental protection agency approved emission factors used to calculate the emissions.

Air Permit Review Agencies

Division of Air Pollution Control
Ohio EPA, Central Office
(614) 644-2270
www.epa.ohio.gov/dapc/general/dolaa.aspx



This map shows jurisdictional boundaries.
Shaded areas represent local agencies within Ohio EPA districts.



Ohio Environmental Protection Agency

District Offices

CDO APC Manager
01 Central District Office
50 West Town Street, Suite 700
Columbus, OH 43215
(614) 728-3778 FAX (614) 728-3898

SEDO APC Manager
06 Southeast District Office
2195 Front St.
Logan, OH 43138
(740) 385-8501 FAX (740) 385-6490

NEDO APC Manager
02 Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087
(330) 963-1161 FAX (330) 487-0769

NWDO APC Manager
03 Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419) 352-8461 FAX (419) 352-8468

SWDO APC Manager
05 Southwest District Office
401 E. Fifth St.
Dayton, OH 45402-2911
(937) 285-6357 FAX (937) 285-6249

 **Administrator**
Akron Regional Air Quality Management District
146 South High St, Room 904
Akron, Ohio 44308
(330) 375-2480 FAX (330) 375-2402

 **Commissioner**
Cleveland Dept. of Public Health
Division of Air Quality
75 Erievue Plaza, 2nd Floor
Cleveland, Ohio 44114
(216) 664-2297 FAX (216) 420-8047

 **Director**
Portsmouth Local Air Agency
605 Washington St., Third Floor
Portsmouth, Ohio 45662
(740) 353-5156 FAX (740) 353-3638

 **Administrator**
Air Pollution Control Division
Canton City Health Dept.
420 Market Ave. North
Canton, Ohio 44702-1544
(330) 489-3385 FAX (330) 489-3335

 **Administrator**
Regional Air Pollution Control Agency
Public Health Dayton and Montgomery Cnty.
117 South Main St.
Dayton, Ohio 45422-1280
(937) 225-4435 FAX (937) 225-3486

 **Administrator**
City of Toledo
Division of Environmental Services
348 South Erie Street
Toledo, Ohio 43604
(419) 936-3015 FAX (419) 936-3959

 **Director**
Dept. of Environmental Services
Air Quality Programs
250 William Howard Taft Road
Cincinnati, Ohio 45219-2660
(513) 946-7777 FAX (513) 946-7778