



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

January 13, 2011

RE: NOV

CERTIFIED MAIL

Mr. Joseph A. Misinec
Executive Vice President
Grand River Rubber & Plastics
P.O. Box 477
Ashtabula, OH 44005-0477

RE: Division of Air Pollution Control Compliance Evaluation for the Operations Located at
2029 Aetna Rd., Ashtabula, OH - Facility Id: 02-04-01-0279

Dear Mr. Misinec:

On 12/16/10, Ohio EPA representative Christine McPhee visited the above-named site to complete the compliance evaluation begun on 8/23/10 with the Division of Air Pollution Control (DAPC) operating permits and other applicable requirements. As requested, additional information was submitted on 1/04/11 and was reviewed. The time and courtesy given by Mr. Jason Brand, Engineering Manager, and Mr. John Rettger, Manufacturing Manager, and you was greatly appreciated. An electronic copy of the inspection report will be e-mailed to you.

The purpose of this letter is to provide a follow-up to the inspection. During our 12/16/10 visit, Ohio EPA learned that the South line grinders (P003) were installed sometime around 2001 without applying for or obtaining an installation permit, which is a violation of the requirements of OAC rule 3745-31-02(A)(1). Ohio EPA acknowledges the 10/26/10 receipt of a permit application for P003.

In 1986 and 1995, Grand River Rubber & Plastics (GRRP) installed the south and north horizontal rubber curing autoclaves (Co. Id. APDV-SV-01 and APDV-NV-01), both of which were installed without an installation permit. These large horizontal autoclaves were estimated to have actual emissions above *de minimis* levels and are subject to permit requirements. A request for more representative emissions information regarding the autoclaves and the extrusion operations is detailed in the latter part of this letter, and will allow us to determine the air pollution control program requirements.

(P001) North line rubber grinding: 6 grinding stations with a wet scrubber and three-stage filter to control particulate emissions (PE)

(P003) South line rubber grinding: 9 grinding stations with a wet scrubber and three-stage filter to control particulate emissions (PE)

On 12/16/10, visible emissions (VE) were observed to be no more than 4.6% opacity, as a 6-min average, from the North line grinders (P001) egress; see Attachment 3 in the inspection report. However, a Method 9 VE observation from the South line grinders (P003) egress could not be made on 12/16/10 because the view of the south egress was obscured by the VE plume from P001.

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During the 12/16/10 site visit, Mr. Jason Brand, Engineering Manager, said it could take a few weeks to install air pollution control equipment (APCE) monitors: gauges to measure the differential pressure of air flow in the fabric filter portion of each the three-stage filters for each rubber grinding line (P001 & P003), differential pressure drop gauges on each wet scrubber and flow gauges to monitor water inflow to each scrubber. He asked if the initial method to assure compliance with the opacity limit could be a daily visible emissions check of each egress at each of the three-stage filters. Eventually the opacity compliance method would be a check of the differential pressure on each of the three-stage filters. Considering occasional difficulties in making a valid visible emissions check on each egress of each grinding line (P001 & P003), Ohio EPA believes that monitoring the differential pressure drop of the three-stage filters is a better measure of equipment performance and will assure compliance with both the opacity limit and mass emissions limit.

Northeast District Office will be writing the permit terms for the rubber grinding operations (P001 & P003). GRRP will have the opportunity of reviewing the permit terms and offering comments before a recommendation is sent to our Central Office in Columbus. The monitoring requirements will be effective once the permits are issued.

Ohio EPA understands that the use of the wet scrubber generates a rubber waste that is too wet to be recycled for use by some outside sources. GRRP may wish to consider the future use of a cyclone or a multi-clone instead of a wet scrubber as the primary particulate emissions control method at the grinding operations (P001 & P003). Information about environmental regulations, compliance concerns and pollution prevention is available through the Office of Compliance Assistance and Pollution Prevention (OCAPP). You may contact an OCAPP representative at 1-800-329-7518 or <http://www.epa.ohio.gov/>, look for "Agency Links" on the left, and select "Pollution Prevention." (Enclosed is an OCAPP pamphlet that explains the program.)

(P00X – P0XX) Thirteen Autoclaves

As requested, GRRP provided production data and installation dates for each autoclave so that the organic compound (OC) emissions could be estimated. The Northeast District Office (NEDO) has made inquiries to U.S. EPA and other Ohio EPA offices for emissions information from autoclave processing of rubber. NEDO found that the factors in U.S. EPA's AP42 Chap. 4.12 (11/08 draft) document, which were based on the average of three exhaust gas test runs, are the best available emissions data for rubber curing via steam autoclave. NEDO estimated emissions by employing the average emissions factor of eight different rubber compound formulations, cited in AP42 Chap. 4.12; see attached document "Rubber Mfg emissions AP42 Chap 4.12 11-08 draft.xls." OEPA understands that up to 150 different rubber compound formulations may be processed at the plant. OEPA has requested that GRRP provide more representative emissions data from the autoclave process based on usage of materials similar to GRRP's materials, if available. OEPA's initial evaluation finds that the actual emissions from the autoclave group does not exceed the *de minimis* thresholds of 25 tons/yr for similar units. The actual emissions from each of eleven vertical autoclaves do not exceed the *de minimis* threshold values of 10 lbs/day of volatile organic compound (VOC) emissions nor 1 ton/year of hazardous air pollutants (HAPs). GRRP may claim *de minimis* status for the eleven vertical autoclaves if records that demonstrate actual emissions do not exceed *de minimis* levels are kept in accordance with OAC rule 3745-15-05(E).

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1. A submittal of representative emissions data from the autoclave process is requested by **1/18/11**. You may wish to consider whether one or more of the formulations identified in the U.S. EPA study is more appropriate than an average of the eight factors presented; see attached "AP42 4.12 Manufacture of Rubber Products_Emissions.pdf." Please include calculations for the emissions estimates, in lbs/day and tons/year, and provide the information source for each calculation method.
2. If revised emissions estimates show that the horizontal autoclaves (Co. Id. APDV-SV-01 and APDV-NV-01) still exceed *de minimis* levels, then an application for an installation Permit-to-Install/Operate must be submitted to this office by **2/22/11**.

Hard copy application forms may be submitted only for a facility that is classified as a non-Title V facility or a non-Synthetic Minor facility. For more expeditious permit application processing, application forms can be electronically submitted via eBusiness; see <https://ebiz.epa.ohio.gov>.

(P00Y – P0YY) Extrusion Equipment

During the 12/16/10, site visit OEPA learned that rubber strips from supplier(s) are extruded into shapes, typically cylinders, prior to curing in a steam autoclave. Both VOC emissions and HAP emissions must be estimated to determine if each extruder qualifies for *de minimis* status where potential VOC emissions at the maximum production rates are no more than 10 lbs/day and potential HAP emissions are no more than 1 ton/year. If potential emissions exceed the *de minimis* levels, and if GRRP can keep records to document that actual emissions are within the *de minimis* levels as allowed by OAC rule 3745-15-05(D). Otherwise, if actual emissions under typical production rates exceed *de minimis* levels, a Permit-to-Install/Operate is required.

3. Please provide maximum and typical production data, installation dates and a company identification for each extruder. For each extruder, please provide estimates of maximum and typical rates of VOC emissions in lbs/day and HAP emissions in tons/year. For the combined extruder group please estimate maximum and typical VOC and HAP emissions, in tons/year. Please state the information source of the emissions factor employed, such as "AP42 Chap 4.12 11-08."
4. If emissions estimates show that an extruder exceeds *de minimis* levels, then an application for an installation Permit-to-Install/Operate must be submitted to this office by **2/22/11**.

FACILITY PROFILE UPDATES IN eBUSINESS

Owner/Contact Information

During the 12/16/10 site visit it was stated that there was a transfer of ownership from Mr. Joe Misinic and other parties to the GRRP employees on 12/15/10. Ohio EPA understands that Mr. Joe Misinic will still have the duties of vice president. Mr. John Rettger is a representative of the new owners. Information that was included with the 10/26/10 permit application for P001 & P003 was uploaded.

5. Please review the "Owner/Contact Change" functionality in Air Services, update as needed, and upload to Air Services within 30 days of ownership transfer.

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For additional information about legal responsibilities, look in Ohio EPA's home page, <http://www.epa.ohio.gov/>, click on "Answer Place" at the top, type key words such as "ownership transfer," click on the "Search" button, and then select the most appropriate answers, such as "Transfer of Ownership and Air Permits."

(B001 – B005) Natural gas-fired boilers

(B002) 5.2 mmBtu/hr natural gas-fired "North American" boiler, model no. BA 8309-B9 was shutdown. OEPA has classified B002 as shutdown in electronic reporting and permit database, known as STARS2.

After 1984, three natural gas-fired boilers were installed: (B003) 5.23 mmBtu/hr natural gas-fired boiler; (B004) 8.4 mmBtu/hr natural gas-fired boiler; and (B005) 9.4 mmBtu/hr natural gas-fired boiler. Since the maximum heat inputs of these natural gas-fired emissions units are less than 10 mmBtu/hr, each one is exempt from the requirements of the Permit-to-Install/Operate program as specified by OAC rule 3745-31-03(A)(1)(a). However, each air contaminant emissions unit must be included in our electronic reporting and permit database, known as Air Services, eBusiness for outside customers.

6. Please include the three new boilers in the facility profile of the Air Services section in eBusiness; see <https://ebiz.epa.ohio.gov>. (The Air Services system will assign a temporary Ohio EU Identification number for you. Ohio EPA will convert the temporary numbers to regular EU identification numbers, B003 – B005.) Each small boiler should be assigned an exemption status of "permit exempt."
7. After the anticipated shutdown of (B001) 5.2 mmBtu/hr natural gas-fired "North American" boiler, model no. AG0172 has been completed, please update the facility profile to classify the operating status of B001 as shutdown.

Autoclaves and Extruders

GRRP's 1/04/11 e-mail stated that the original three autoclaves (P002) 3 horizontal rubber vulcanizers, installed in 1949, were replaced by three of the current ones. OEPA has classified P002 as shutdown in the STARS2 system.

8. Please include each autoclave and each extruder in the facility profile of the Air Services section in eBusiness.
 - a. For each unit where the emissions are at *de minimis* levels mark the exemption status as "*de minimis*."
 - b. For each unit where the emissions are above *de minimis* levels mark the exemption status as "NA" for not applicable.

Please update the ownership change in the Air Services facility profile, as requested in item no. 5, by **Saturday, 1/15/11**. Please submit the requested information in item no. 1 to the undersigned at the Northeast District Office by **Tuesday, 1/18/10**. Please submit the extruder emissions data requested in item no. 3 by **Tuesday, 2/01/11**. Please submit permit applications for non-exempt autoclaves and extruders by **Tuesday, 2/22/11**. Please upload updates to the facility profile, as requested in item nos. 6 through 8, by **Tuesday, 2/22/11**. If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency.

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If you have any further questions, you may contact me at (330) 963-1205 or Christine.McPhee@epa.state.oh.us.

Sincerely,



Christine McPhee
Environmental Specialist
Division of Air Pollution Control

CM:bo

enclosures - hard copy OCAPP brochure
- electronic inspection report
- electronic AP42 Chap. 4.12
- electronic GRRP Autoclaves Emissions

pc: Tim Fischer, DAPC, NEDO
Tom Kalman, DAPC, CO
Bill McDowell, U.S. EPA, Region V

ec: Joseph Misinec, Grand River Rubber & Plastics, jmisinec@grp.com
Jason Brand, Grand River Rubber & Plastics, jbrand@grp.com
Misty Koletich, DAPC, NEDO