



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

October 25, 2010

**RE: NOTICE OF VIOLATION
HIGH PRIORITY FACILITY GC7**

CERTIFIED MAIL

Mr. David Murtha
Director of Operations
Continental Structural Plastics of Ohio, LLC
333 Gore Road
Conneaut, OH 44030

RE: Division of Air Pollution Control Compliance Evaluation for the Operations Located at
333 Gore Rd., Conneaut, Ohio - DAPC Facility ID No. (02-04-02-0245)

Dear Mr. Murtha:

On 9/15/10, EPA representative, Christine McPhee, visited the above-named site to determine compliance with the Title V operating permit, issued by the Division of Air Pollution Control (DAPC), and other applicable requirements. As requested, additional information was submitted on 9/28/10 and 10/05/10 and was reviewed. The time and courtesy given by John Berwald, SMC Manufacturing Manager; Beverly Merlene, Human Resources Manager; and Mr. Vinod Shah, Environmental Affairs Director, 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. We found violations of a work practice requirement within the National Emissions Standards (NESHAP) for Hazardous Air Pollutants (HAPs): Reinforced Plastic Composites Production to a mixer vessel that is employed as a storage (holding) vessel for polyester/resin styrene paste. Documentation of the HAP content of materials employed at the plastic parts coating line (K001) is requested to determine which option for compliance with the NESHAP for Surface Coating of Plastic Parts and Products is achieved and which is the appropriate record keeping requirement. Additional information and/or revisions to the current record keeping programs are requested by **11/15/10** and are discussed below.

Applicability of NESHAP for Reinforced Plastic Composites Production to Holding Vessel for Polyester Resin Styrene Paste

On 9/15/10, the mixer vessel from (P028) "Cowles" mixer no. 1 was observed to be open to the air while the polyester/resin styrene "A" paste was extracted from the bottom of the mix vessel and fed to (P035) Inline mixer/tank system 1: 370 gal "B" tank & inline mixer, which feeds the 24" SMC machine no. 1 (P001). Ohio EPA sees the use of the mixer vessel as a holding vessel, which is considered to be HAP-containing materials storage, defined in the Code of Federal Regulations (CFR), CFR 63.5935 as: *HAP-containing materials storage means an ancillary process which involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.*

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The initial Notification of Compliance Status with 40 CFR Part 63 Subpart WWWW was included in a 3/31/05 letter from Venture Holdings Corp, the former name of this Conneaut, Ohio site, and stated the following:

Storage of production materials containing HAP (resins, SMC in maturation, pastes) is subject to the following Subpart WWWW Table 4 requirements: Section 3. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

The Bulk Resin Tanks and A-Paste Day Tanks are closed tanks passively venting primarily displaced headspace to the atmosphere during filling. The A-Side Tanks are covered vessels fitted with mechanical stirrers mounted atop the covers, which also vent displaced headspace passively.....

It appears that use of a mixer vessel/holding tank was not specifically identified, but rather generally classified as a HAP-containing pastes storage operation in the 3/31/05 notification. According to a 10/05/10 Continental Structural Plastics (CSP) e-mail sent by John Berwald, the container holding the polyester resin/styrene paste is not associated with any equipment in P035, the operation that processes polyester resin/styrene paste. Ohio EPA's 9/15/10 observation and the 10/05/10 CSP e-mail confirm that equipment associated with P035, a 370-gallon "B" tank, is covered and that the inline mixer is a closed operation. However, CSP operates an open mixer vessel (P028) as a HAP-containing storage operation without a cover or closure in violation of 40 CFR 63.5900(4) which requires performance of the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW.

1. Please submit a compliance plan to either cover or use a closed container for the storage of polyester resin/styrene paste, generated at the "Cowles" mixer (P025), prior to use at the tank/inline mixer 1 system (P035). The compliance plan shall include the following:
 - a. A description of the process operations modification or process equipment design change to be done;
 - b. The date orders will be issued for the process operations modification or the purchase of equipment (components);
 - c. The date process operations changes or equipment installation will be initiated;
 - d. The date process operations changes or equipment installation will be completed; and
 - e. The date compliance will be achieved.

Record Keeping Requirements

(P022) injection mold press no. 18 with 2 cavities for composite plastic parts

(P023) injection mold press no. 19 with 2 cavities for composite plastic parts

(P024) injection mold press no. 20 for composite plastic parts

Permit-to-Install (PTI) #02-12229 term A.III.2. requires daily records of any cleanup solvent usage at P022, P023 & P024. Our review of the records found no column, noting whether any cleanup solvents were employed, in the electronic "press page" record for (P023) press 19. Even if cleanup solvents usage is not performed in mold presses 18 - 20 (P022 - P024), a note in the record should indicate the identification of any cleanup solvent usage and whether or not the cleanup solvent employed contains any organic compounds. The records are required as documentation of compliance status with the operational restriction in PTI term A.II.2. that OC containing cleanup materials are prohibited.

2. Please revise the electronic records for each of press nos. 18, 19 & 20 (P022), (P023) and (P024), respectively, to include the following:
 - a. An identification of any cleanup materials were employed;
 - b. The OC content, in percent by weight, of the cleanup material; and
 - c. The number of pounds of cleanup material employed.
3. Please send copies of the revised record formats for (P022 – P024) press nos. 18 - 20 to the Northeast District Office. Electronic copies are preferred, but hard copies will be accepted.

(P028) Cowles Mixer for Polyester Resin/Styrene Paste Production

PTI #02-22050 term A.III.5.b. for P028 requires monthly records of styrene throughput, as a rolling 12-month summation to document compliance with the limit of 1,892.75 tons per rolling 12-months to limit volatile organic compound (VOC) emissions to below major source levels.

Our review of the "Rolling 12-Month Styrene Throughput at Cowles Mixer (P028)" electronic record found monthly styrene usage values for each month during the January through August, 2010 period. However, the monthly styrene throughputs were not included for the previous months in 2009. "This Year's Rolling 12-mo Tons Styrene Mixed" column is currently a cumulative styrene throughput for the calendar year rather than a rolling 12-month summation of styrene throughput as required by PTI #02-22050.

4. Please complete the electronic records for (P028) Cowles Mixer as follows:
 - a. Include the styrene usages from production operations for each month in 2009; and
 - b. Revise the formula for each cell in the "This Year's Rolling 12-mo Tons Styrene Mixed" column to calculate the styrene usages of the previous 12 months for every month in 2010.
5. Please send copies of the revised record format for (P028) Cowles mixer to the Northeast District Office. Electronic copies are preferred but hard copies will be accepted.

(K001) Coating line for plastic parts

Mr. Vinod Shah (CSP) asked whether the catalyst of a two-component coating was considered to be additive in regards to interpreting the requirements of the NESHAP for Surface Coating of Plastic Parts and Products, also known as the plastic parts coating Maximum Achievable Control Technology (MACT) standards. A U.S. EPA decision was received on 9/27/10 via a 9/28/10 e-mail from Mr. Mohammad Smidi (Ohio EPA, Northwest District Office) and stated that a catalyst is considered a part of the coating, as applied, and is not an additive. PTI 02-19379 term A.III.6. requires formulation data records of coating, thinner and/or other additive, and cleaning material. The presence of the coating formulations within the electronic spreadsheet records were verified, but hard copies were not requested during the 9/15/10 site visit.

6. Please submit copies of the formulations for each coating, as applied, and each cleanup material employed in 2009 and 2010 that show the following:
 - a. The HAP content of each cleanup material; and
 - b. The HAP content of each coating as applied, in lb organic HAP per lb solids.
7. Is the coating line, K001, still considered as a general use operation or another classification specified in 40 CFR Part 63 Subpart PPPP (i.e. auto lamp operation, thermoplastic olefin operation, or new assembled on-road vehicle operation)?

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The organic HAP content limit for coatings used during each 12-month period per 40 CFR 63.4490(a) and PTI# 02-19379 term A.I.2.c. is 0.16 lb organic HAP/lb solids for a general use operation; see page 15 of the inspection report. PTI term A.II.4. prohibits the use of cleanup materials, containing HAP compounds, as does the compliant material option of 40 CFR Part 63 Subpart PPPP.

8. Please identify which MACT compliance option is typically employed at K001.

If using the "emissions rate without add-on controls option," the monthly HAP emissions from coatings, thinners and/or additives and cleaning materials must be determined and documented in records; see PTI term A.III.4.c.ii, A.III.4.d., A.III.4.d.i. and A.III.4.d.ii. Documentation of the HAP content of each material, as applied, is need for the compliant material option; see PTI term A.III.4.c.i.

Reporting Requirements

The Northeast District Office has made an applicability review and determined that CSP-Conneaut plant is subject to new OAC rule 3745-21-25 for the control of VOC emissions from reinforced plastic composites production operations. OAC rule 3745-21-25 is similar to 40 CFR, Part 63, Subpart WWWW. A brief description of VOC requirements in OAC rule 3745-21-25(D) is included in the "Applicable Emissions Limits and Requirements" and/or "Memo" row for the sheet mold compound production machines, mold presses, and polyester resin/styrene paste production mixers, on pages 3, 8, 11, respectively, of the inspection report. There are additional reporting requirements in OAC rule 3745-21-25. An initial compliance report was due 2/12/10 and was received on 10/21/10. The affected emissions units have been identified as required in OAC rule 3745-21-25(S)(1) (c).

9. Please submit a revised applicability notification (report) that includes the information specified in OAC rule 3745-21-25(S)(1)(a), (b), (d) and (e) and upload to Air Services in eBusiness. A copy of the effective rule may be downloaded from the Ohio EPA website: http://www.epa.ohio.gov/dapc/regs/3745_21.aspx.

According to OAC rule 3745-21-25(R)(1)(a), the compliance date (deadline) is no more than twelve months from the 12/14/09 effective date of the rule, which is 12/14/10.

10. Please submit the first semiannual OAC rule 3745-21-25 compliance status report for the 12/14/10 – 12/30/10 period by **1/31/11** via Air Services in eBusiness. The semiannual compliance status report shall contain the information required in OAC rule 3745-21-25(Q)(3)(a) through (Q)(3)(h).

Subsequent OAC rule 3745-21-25 compliance status reports are due at the same time the Title V semiannual reports are due. Since the Composite Plastics MACT requirements are similar to the OAC rule 3745-21-25 requirements, you may wish to consolidate the compliance status/deviation reports and update the rule references in the report format(s).

Please note that changes to the rule were proposed on three different dates in 2010. You are advised to view the Ohio EPA website for the final version of the rule revisions: <http://www.epa.ohio.gov/dapc/regs/regs.aspx#Carbon>.

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Status of Application for Renewal Title V Operating Permit (# P0084209)

The application for renewal Title V Operating Permit #P0084209 is in the administrative review stage. We saw that (P014) injection mold press no. 10 with a slitter was noted as shutdown in the revised facility profile which was recently uploaded to Air Services via eBusiness.

Please submit the information requested in item nos. 1 - 9 and any other items that you wish by **11/15/10**. If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency. Should you have any comments or questions about this correspondence, please do not hesitate to contact me at (330) 963-1205, or via e-mail at christine.mcphee@epa.state.oh.us.

Sincerely,



Christine McPhee
Environmental Specialist
Division of Air Pollution Control

CM:bo

Electronic enclosure(s)

pc: Misty Koletich, Ohio EPA, NEDO, DAPC
Tim Fischer, Ohio EPA, NEDO, DAPC
Tom Kaiman, Ohio EPA, CO, DAPC
L. HOLSCHER, U.S. EPA, Region V

ec: David Murtha, Continental Structural Plastics of Ohio (CSP of Ohio)
John Berwald, CSP of Ohio
Vinod Shah, CSP,
Beverly Merlene, CSP of Ohio