

Air Pollution Control Requirements for Plastic Composites Production Recordkeeping Procedures

The Environmental Protection Agency (EPA) issued the Reinforced Plastic Composites Production National Emission Standard for Hazardous Air Pollutants (NESHAP) on April 21, 2003 [40 CFR Part 63 Subpart WWWW]. This fact sheet is a supplement to the Clean Air News for Plastic Composites Manufacturers and provides a general overview of the record keeping requirements for affected facilities.

What Records Must I Keep?

Minor Facilities

Most facilities in New York State will “cap out” of the plastic composites NESHAP either through a Registration or State Facility Permit from the New York State Department of Environmental Conservation (DEC). This “capping” option requires facilities to limit their annual styrene emissions below five tons for a Registration, or below ten tons for a State Facility Permit. Annual emissions are calculated on a rolling twelve month basis. The Small Business Environmental Assistance Program (SBEAP) can provide you with a spreadsheet (see reverse side) that will perform these emission calculations and simplify your record keeping.

Records must be kept onsite for a *minimum of five years* to demonstrate compliance with emission limits. The following information should be kept on file and be available upon inspection:

1. Information on the process and equipment including: equipment description, make/model, production capacity, and emissions controls, if any.
2. A monthly log containing the amount of materials (containing HAP) used.
3. Purchase orders and invoices to support the information in the monthly log.
4. An annual report of emissions is required from businesses with a ten ton “cap” on styrene under a state facility permit.

Major Facilities

If you are a major facility and subject to the NESHAP, the record keeping requirements are substantial. In summary, records must be kept for five years with a minimum of the most recent two years’ worth of records to be kept onsite. Records for the remaining years may be kept offsite. Records can be in the form of paper copies or computer readable media. *Examples of records that must be kept include:*

1. A copy of each notification and report submitted to comply with this NESHAP, including all supporting documentation.
2. The records related to startup, shutdown and malfunction.
3. Records of performance tests, design and performance evaluations.

Compliance Record Keeping Spreadsheet for Plastic Composites Manufacturing

The SBEAP has developed a computer spreadsheet for manufacturers of plastic composite products that will simplify and organize your compliance record keeping. *You can download this EXCEL spreadsheet from our website, The SBEAP Homepage, or call us and we’ll email the file to you.*

The spreadsheet consists of three types of worksheets:

- A styrene emission factor calculator to figure out how much styrene is emitted per ton of product/material (i.e. resin) used
- Monthly styrene emissions worksheets (Jan-Dec)
- An annual total styrene emissions worksheet

Basic Set-Up Steps:

1. Gather current Material Safety Data Sheets (MSDS) for each product/material (resins and gel coats) that you use. Contact your material supplier to verify that you have current sheets as styrene content can vary significantly. Your supplier may also suggest that you refer to batch certification sheets for even more accurate information.
2. For each product, locate the % Styrene content in the section of MSDS, or batch certification sheet, showing ingredient composition.
3. Enter the % Styrene content into the appropriate resin application process and the emission calculator will compute an emission factor based on how the product is applied and several other variables.
4. A monthly styrene emission worksheet will need to be set up. This will consist of a listing of each product (i.e. resin), the styrene emission factor, amount/weight of that product used. Once this is set up, the spreadsheet will do the rest. Each month the operator will merely enter the amounts of each product used and perhaps edit the sheet to add/delete products as needed.
5. The monthly worksheet will need to be printed out each month and kept in a binder for inspection by the Department of Environmental Conservation (DEC).
6. The annual total styrene emissions worksheet is calculated automatically based on the monthly worksheets. Since this worksheet summarizes the facility's emissions for the most recent 12 months, it should also be printed out monthly.

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