



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of Haysite Reinforced Plastics LLC
Inspection Date(s): September 26, 2023
Regulatory Program(s): Title V, SIP, NESHAP
Company Name: Haysite Reinforced Plastics LLC
Facility Name: Haysite Reinforced Plastics LLC
Facility Location: 5599 New Perry Highway
Erie, PA 16509
Latitude: 42.08408 **Longitude:** -80.05502
County/Parish: Erie County
AFS/ICIS-Air Number: PA000511900
Permit Number: 25-00783
NAICS Code: 326130 **SIC:** 3083
Unique Project #: 3E23CA037A

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EPA Lead Inspector

Signature

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Date

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Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Haysite Reinforced Plastics LLC (Haysite or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on September 11, 2023, via email. On September 22, 2023, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Benjamin Smith, prior to the inspection (see Attachment 1).

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, prior to, or following the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 5599 New Perry Highway, Erie, PA 16509. Haysite was founded in the 1950's and has been a member of the Isovolta Group since August 2018. Isovolta is headquartered in Austria and is one of the leading manufacturers of electrical insulating materials. Isovolta is part of Constantia Industries AG. Haysite has approximately seventy employees and is headquartered in Erie, PA. The Facility manufactures fiberglass reinforced polyester products and has a NAICS code of 326130 and a SIC code of 3083. The Facility has a testing lab in addition to the manufacturing portion of the facility.

The Facility received a Title V State Operating Permit (25-00783) from PADEP issued on July 24, 2019.

Haysite Reinforced Plastics LLC is classified as a major source of emissions for volatile organic compounds (VOC) and hazardous air pollutants (HAP) and a minor source for all other criteria pollutants. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 63 Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (MACT 4W)
- 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines (MACT 4Z)
- 40 CFR Part 63 Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters (MACT 5D)
- 40 CFR Part 63 Subpart JJJJJ – National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers Area Sources (MACT 6J)

B. Inspection Opening Conference

At 8:34AM on September 26, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Haysite Reinforced Plastics LLC was represented by Benjamin Smith (Safety Manager) and David Janas (Managing Director). Also, Joshua Shah of PADEP was present. EPA inspectors, Dean DeLuca and Bruce Augustine, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, David Janas did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

The Haysite facility has approximately 110,000 square feet under roof including the offices and has had multiple owners over its history. It was previously owned by Alco Industries which has since disbanded. In 2014, Haysite was sold to Dunes Point Capital, who owned the site until August 2018, when it was sold to the Isovolta Group, who is the present owner. There are over 1,000 employees companywide, but a closer approximation was not known at the time. Isovolta has five facilities in North America and Constantia has multiple sites. Haysite employs approximately seventy full-time hourly employees and thirty salaried employees. The Facility typically operates three shifts a day five days a week.

The majority of Haysite's business is in electrical insulation, however they also do some work in health care, water treatment, platen insulation, and railcars. There are no rail lines at the Facility, therefore all raw materials and finished products are shipped by truck. The bulk delivered raw materials are pumped into bulk storage tanks and smaller amounts of raw materials are stored in fifty-five-gallon drums. The Facility stated they do not have tooling capabilities for manufacturing molds, and they do not have a parts washer.

The Facility stated there have been no operational or equipment changes since the last permit, other than a new pultrusion puller (#7) installed in 2019 which replaced puller #1 that was removed in 2018. The pultrusion molding process currently has five pullers. Pultrusion pullers #5 and #6 produce reinforced plastic sheets while pultrusion pullers #3, #4, and #7 produce reinforced plastic profiles according to customer specifications. There are no emission controls/collections devices from the pultrusion molding process to limit the emissions of VOC and HAP. There is a dust collector in the mix room to collect particulate matter from batch mixing, but there are no VOC controls. The Facility indicated that they are not aware of any reduction in HAP emissions from the processes.

There are three dust collectors, including the previously mentioned collector for the mix room, which are located outside the main production building. The Facility also has an emergency generator, which is solely used for lighting during emergencies and two boilers for process steam. The generator and the two boilers all use natural gas as the fuel for combustion. Haysite stated they do not have any set annual maintenance outages for repairs.

The Facility tracks the volume of resins used and throughput on a daily basis and these values are used to calculate the monthly emissions of VOC and HAP. The Facility also takes daily pressure drop readings on the dust collectors and records them on a sheet at each dust collector. The monthly sheet is then scanned at the end of each month.

The opening conference concluded at 10:45 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:47 AM by Benjamin Smith and Dave Janas of Haysite Reinforced Plastics and Joshua Shah of PADEP was also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2). At the start of the walkthrough, it was sunny and became cloudy over the course of the walkthrough with the temperature being in the mid 60's.

The inspection team first observed a quality/patch room in which closed containers of approximately five-gallon capacity were observed. After which, the inspection team went to the shear/saw room which had a panel saw, sander, and two machining devices. These machines were ducted to a dust collector located on the exterior of the building. The exhaust of this dust collector vented back into the shear/saw room. The inspection team observed the Facility's natural gas emergency generator which was located in a smaller room in this area. At the time of the inspection, the generator was not operating and the hour meter for the emergency generator was 243.7 hours. The Facility's workers took their lunch break at this time, so the dust collector was turned off when we went outside. The dust collector is required by the permit to operate anytime the process in the shear/saw room is in operation. The inspection team returned to the shear/saw room and had the Facility turn on the dust collector so we could observe the pressure drop reading while in operation. The pressure drop observed during the inspection was 1.6" w.g. White dust was observed on the ceiling above the dust collector exhaust.

The inspection team then proceeded to the exterior shipping area which is located under an overhang. There was an odor noted in this area near the barrels by the roll-up door. Drums were observed in this area which were being cured for disposal. Nearly all the fifty-five-gallon drums had clear plastic covers which the Facility called poly closures. Many of the drums had labels indicating they contained resin, and some were observed to have rags or other waste products which may have been resin laden. One of the drums of particular note was an open drum containing a sheet barrel resin with a styrene monomer as an ingredient. Adjacent to the drums was an curing oven that is used to cure leftover resin in the drums prior to disposal. EPA also observed a roll-off dumpster located in the area with cured resin buckets and drums. Haysite stated that the roll-off is sent off-site for disposal.

The inspection team then observed the hot room, which is used to cure resins for a couple of days with the duration depending on the product. The hot room has a high ceiling, and no emission controls were observed. During the inspection, the hot room was filled below half capacity. EPA then observed the bulk storage tank room. Upon entry an odor was noted by EPA. The Facility stated the seven tanks are filled from the top when raw materials are received and are drained to have the inside cleaned every three to five years. Two of the tanks contain a styrene monomer and five tanks contain thermoset polyester resins; one of which was Ashland

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7320-1. The Facility also stated that resin is the most common raw material. All of the seven tanks were observed to have streaks and staining on the top and sides, likely from past overfilling.

Outside of the raw material batch mixing room EPA observed multiple drums with metal lids and opened pouring spouts while others were observed to have poly closures. The inspection team then proceeded outside and observed the mixing room dust collector and pultrusion dust collector. The mixing room dust collector had a tarp on top which the Facility stated was to keep out the elements. The Facility also stated the plan is to redo the whole mixing room to a state-of-the-art mixing room in the next three years. The Facility stated the pultrusion dust collector has eight cartridges. Later in the inspection, the inspection team recorded the mixer room dust collector had a pressure reading of 4.8" w.g. and the pultrusion puller dust collector had a reading of 1.0" w.g. There were no extra filters observed for the dust collectors.

The raw material mixing room had drums containing raw material resins suspended from the ceiling so they could more easily be moved around the room. There were a couple smaller, approximately five-gallon, buckets denoted as "color" observed open. There were two larger batch mixers located in the room. Neither batch mixer was in use at the time of the inspection. One of the large mixers was open to the atmosphere and was empty but the Facility could not quickly locate the lid (approximately 12" diameter). One of the three rotary mixers was in use during the inspection. The rotary mixers had an opening around the motor of approximately 8" diameter. Adjacent to the mix room, there was an acetone storage shed. The new acetone was located on one side of the shed and the used acetone was located on the other. This shed vented outside with no emission controls. There was staining of different colors on the ground and walls in this shed.

The EPA inspection team proceeded to the pultrusion puller area. Raw material batches are introduced into the machine along with a glass mesh string and are pulled through the pullers. The Facility stated that pullers #3 and #4 are set to be replaced within a couple years and a request for determination (RFD) was submitted to PADEP to determine if a permit is necessary. The Facility stated puller #7 can pull more glass than puller #3 or puller #4 and its resin bath is a little larger. Pullers #5 and #6 were not operating at the time of the inspection.

EPA observed two boilers located within the boiler room. One was a Burnham boiler that was rated at 3,348,000 BTU/hour and was labeled for use with either natural gas or #2 fuel oil. The Facility stated they only use natural gas and do not use #2 fuel oil. The other boiler was a Cleaver Brooks from 2021 and was rated at 4,184,000 BTU/hour. Both boilers are used to provide process steam.

EPA observed nine presses which make flat sheets. At the time of the inspection, there were five operating presses. There were also ten compression molding machines which make specific molds according to customer specifications.

The walkthrough concluded at 12:45 PM.

IV. Records Review

EPA did not conduct records review onsite. A follow-up discussion commenced at 1:18 PM after a break for lunch. During this discussion, the Facility stated the 100-ton molding machine from Permit #25-00783 Source #102 was removed. On September 25th, the day before the inspection, the Facility submitted some of the documents requested in the EPA's September 22, 2023, email to Benjamin Smith (see Attachment 1). These documents included: the Facility layout; VOC and styrene emission calculations; emission factors and methodology; material throughputs; and the information for the 2022 emissions inventory submittal. Haysite stated they should be able to provide the remainder of the requested documents within a few weeks. EPA inspectors were not able to review prior to the inspection. In addition to the original records requested by email, EPA requested the following records while onsite:

1. Number of sites operating under the parent company Constantia Industries AG.
2. Safety Data Sheets (SDSs) for the resins used.
3. The Facility's initial notification required by 40 CFR Part 63 Subpart WWWW.
4. List of emission production processes not operating at the time of the inspection.
5. The RFD submitted by the Facility in December 2018 for Puller #7.
6. An image showing the filter storage.
7. The RFD submitted by the Facility very recently for Puller #3 and Puller #4.

V. Closing Conference

Starting at 1:50 PM, EPA inspectors, Benjamin Smith and Dave Janas of Haysite Reinforced Plastics and Josh Shah of PADEP had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. EPA reiterated Haysite's right to claim any material as CBI and Haysite representatives did not claim anything as CBI. The inspection concluded at 2:00 PM.

The following have been identified as *potential* issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by Haysite Reinforced Plastics.

- Haysite covers open drums containing VOC and HAP resins with plastic poly covers rather than a metal sealed lid. These covers are not typical to other covers observed on drums at sites. EPA will conduct a review of the poly film covers for the fifty-five-gallon drums to determine if they meet the closed cover requirements.

VI. List of Attachments

- Attachment 1: Email correspondence to Benjamin Smith of records requested to review during inspection
- Attachment 2: Photo Log

Deluca, Dean

From: Deluca, Dean
Sent: Friday, September 22, 2023 12:42 PM
To: benjamin.smith@isovolta.com
Cc: Augustine, Bruce; Shah, Joshua
Subject: EPA Inspection of Haysite Reinforced Plastics

Good afternoon Benjamin,

Per today's phone conversation, EPA is going to conduct a Clean Air Act inspection of Haysite Reinforced Plastics on Tuesday, September 26, 2023. EPA will have two inspectors onsite to conduct the inspection, which will include an opening conference, site walkthrough (including photos), and record review/closing conference. You have the right to claim confidential business information so please inform us if anything is being claimed as confidential. EPA should arrive at the facility on the morning of 9/26/23 at about 8:30AM. Please see the below list of records EPA would like Haysite Reinforced Plastics to provide. I will include a separate email with a link for Haysite to upload documents using EPA's goanywhere file sharing site. As I mentioned on the phone and in number 1 below, I would like to have a hardcopy of the facility plot plan available at the time of the inspection. You indicated that the required PPE for the facility includes safety glasses and steel toed shoes. Can you please confirm receipt of this email and let me know if you have any questions about the inspection or record request.

Can you please prepare the documents and/or answers to the following items?

1. Provide a plot plan of the facility available in hardcopy for the inspection opening conference which identifies each processing unit, control device, storage vessels, etc. for the facility.
2. Provide a detailed process description which includes all process units and emission points currently operational at the site.
3. Provide the potential to emit (including calculations) for styrene, total HAPs, VOCs, SO_x, and PM.
4. Provide the two most recent annual emissions inventory statements as well as any calculations and emissions factors used to calculate emissions for each pollutant for each process and the origin of each emission factor.
5. Provide the date the facility commenced operations and the date(s) of any ownership change, if applicable.
6. Provide the address of any other locations owned and/or operated by Haysite Reinforced Plastics LLC or any parent company.
7. Provide Haysite's net worth as well as that of any parent company.
8. Provide the details on any process, equipment, or material changes which increased or decreased emissions since the last permit issuance in July 2019.
9. Provide the tons of thermostat resins and gel coats containing styrene that were used each year for the period from January 2019 – August 2023.
10. Provide all 6-month monitoring and deviation reports including the semi-annual 40 CFR Part 63 WWW compliance report submitted to PA DEP for the period from January 2019 – August 2023.
11. Provide the three most recent annual compliance certification reports.
12. Please provide any Risk Management Plan (RMP) which was required by Section 112 (r) of the Clean Air Act.
13. Provide records required by PA DEP's July 24, 2019's Permit #25-00783, section C.III. #008 from January 2019 – August 2023. If monthly or weekly monitoring is being conducted, please provide the monitoring events which allowed less frequent monitoring, even if before January 2019.
14. Provide the monthly hours of operation and throughputs of: the flat sheet molding process in tons per hour; the BMC/SMC compression molding process in tons per hour; the pultrusion molding process in pounds per hour; the 700-gallon bulk mixing vessels in tons per year of supply resin; and the emergency generator in natural gas

usage per year along with the purpose of use for the emergency generator, for the period from January 2019 – August 2023.

15. Provide monthly preventative maintenance inspections of the mix room's dust collector and the pultrusion saws' dust collector for the period from January 2019 - August 2023.
16. Provide the daily inspections of the pultrusion saws' dust collector for January 2019, July 2021, and April 2023.
17. Provide the dates and stack test results summary pages of the most recent stack test for the flat sheet molding, BMC and SMC compression molding, pultrusion molding, and mix room.
18. Provide the maintenance records for the emergency generator for the period from January 2019 – August 2023.

Thanks, Dean

Dean DeLuca
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Attachment 2: PHOTO LOG

Facility: Haysite Reinforced Plastics LLC

Location: 5599 New Perry Highway, Erie, PA 16509

Inspection Date: September 26, 2023

EPA Inspector(s): Dean DeLuca and Bruce Augustine

Photographer: Bruce Augustine



Photo Number: 1

Photo Description: Quality/Patch Room



Photo Number: 2

Photo Description: Compression Molded Finished Product



Photo Number: 3

Photo Description: Shear Saw Sander Dust Collector Exhaust



Photo Number: 4

Photo Description: Emergency Generator Nameplate



Photo Number: 5

Photo Description: Emergency Generator



Photo Number: 6

Photo Description: Shear Saw Room Dust Collector (not operating during picture)

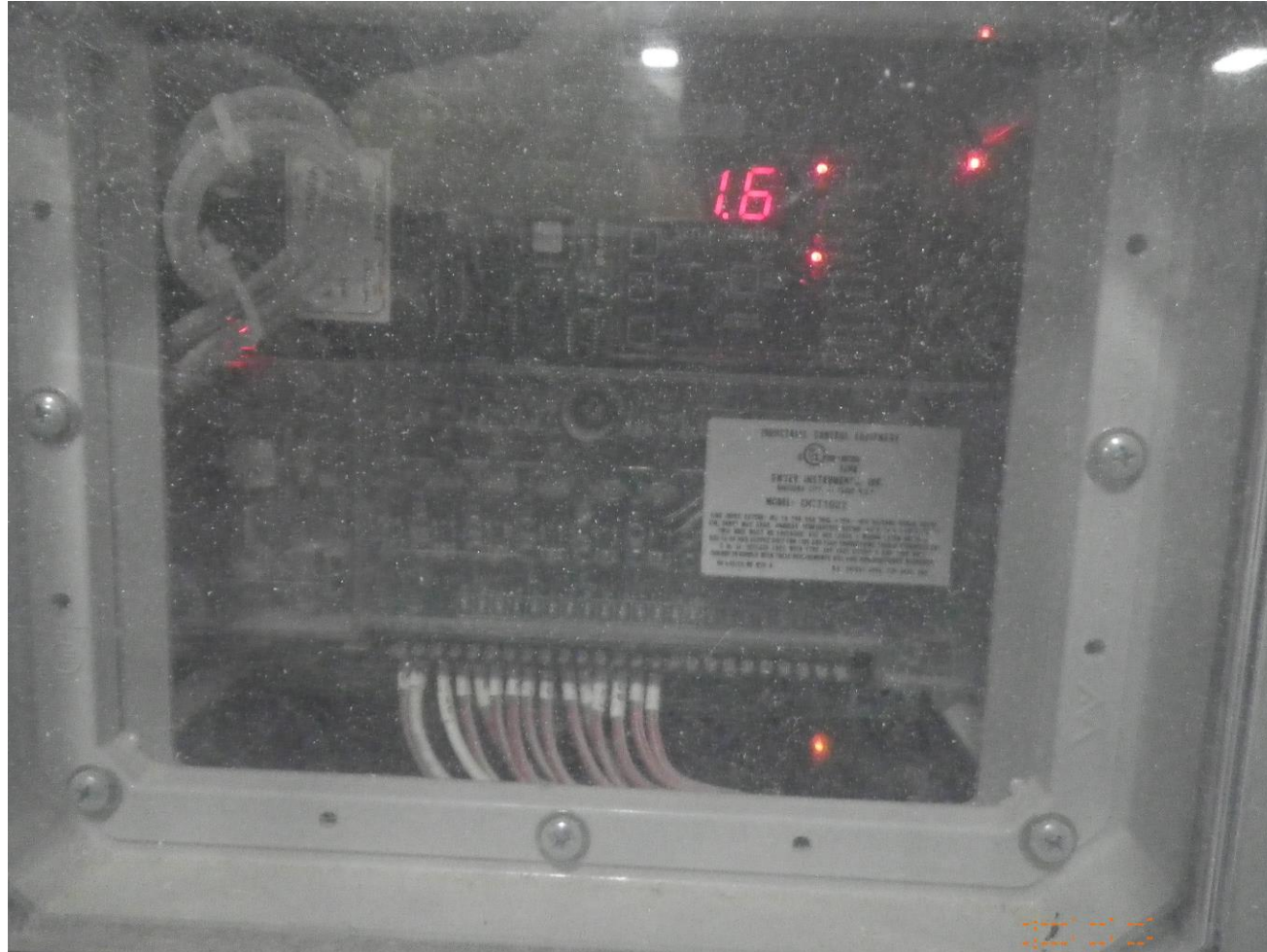


Photo Number: 7

Photo Description: Shear Saw Room Dust Collector Pressure Drop (in operation)



Photo Number: 8

Photo Description: Roll-off Dumpster with Cured Resin Buckets



Photo Number: 9

Photo Description: Two Drums Labeled Acid for Disposal



Photo Number: 10

Photo Description: Open Resin Drum Outside

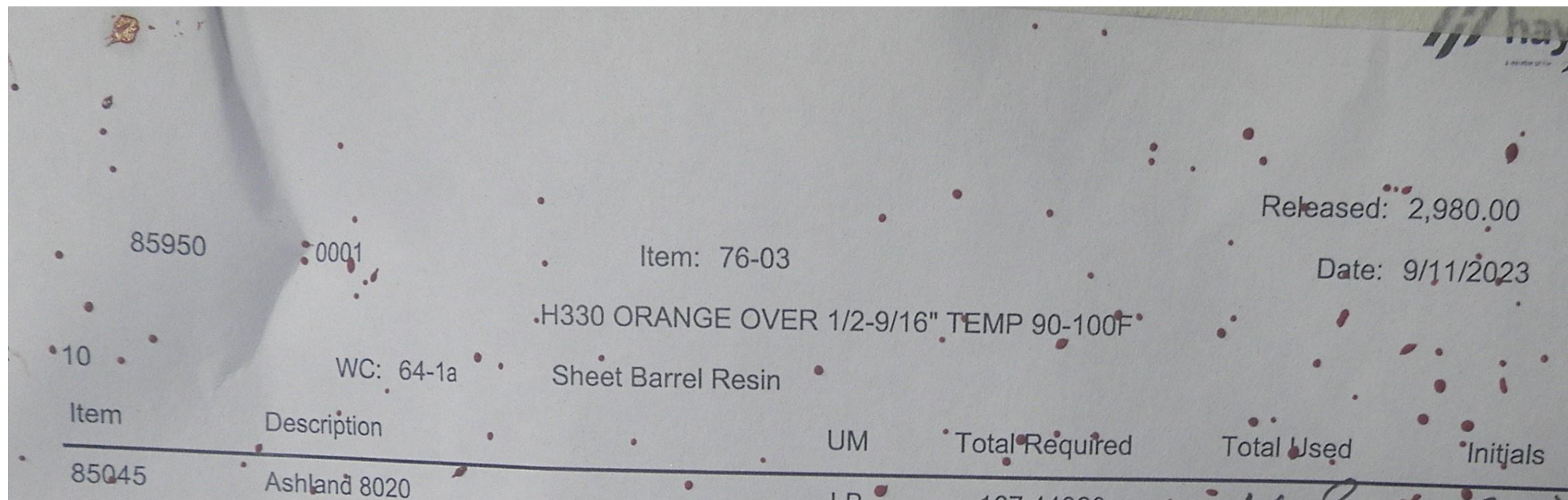


Photo Number: 11

Photo Description: Spec Sheet for Product on Side of Open Resin Drum



Photo Number: 12

Photo Description: Drums Waiting to be Cured in Oven



Photo Number: 13

Photo Description: Hot Room with Open Buckets

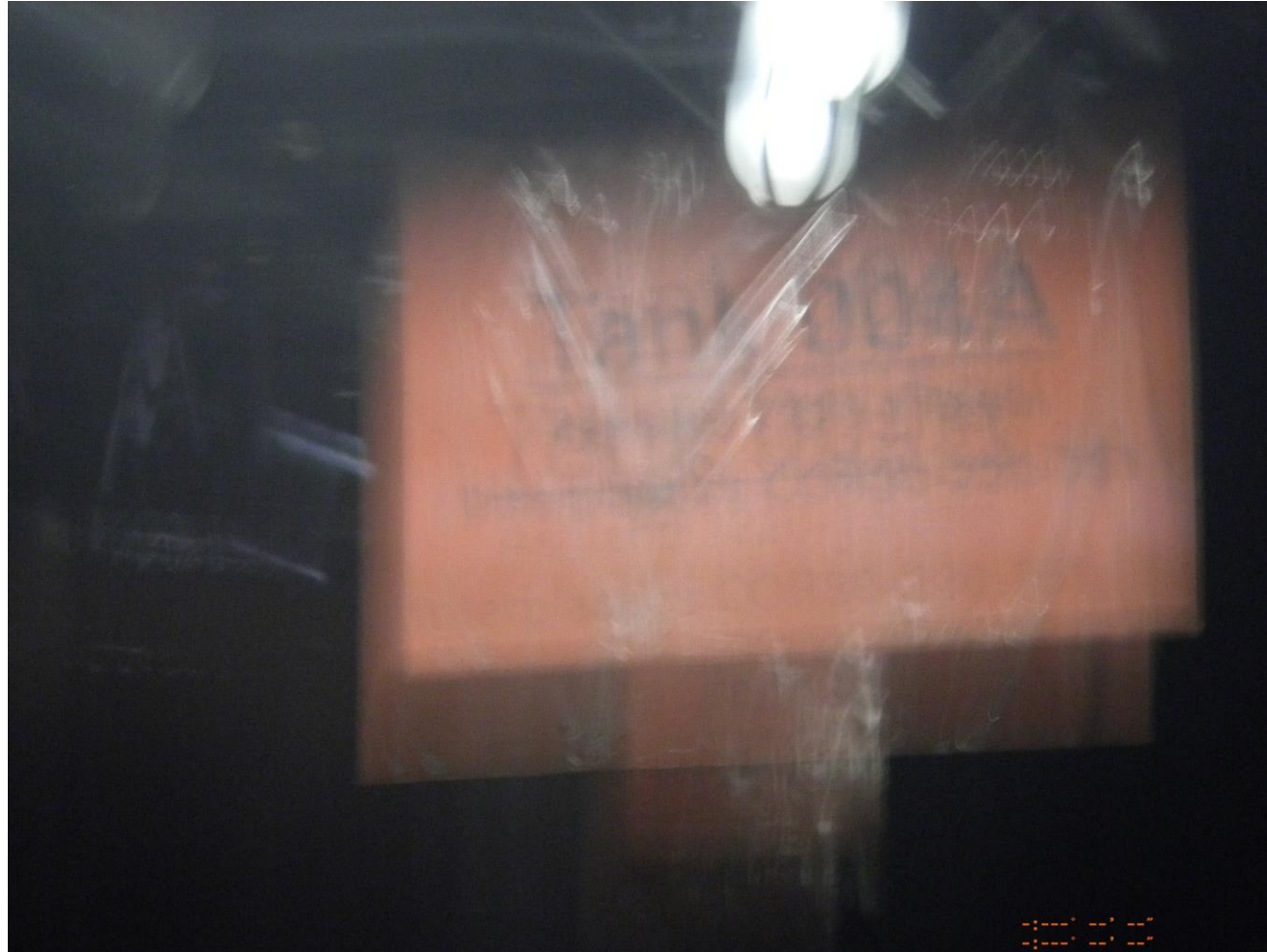


Photo Number: 14

Photo Description: Bulk Storage Tank 4 Label (blurry)



Photo Number: 15

Photo Description: Bulk Storage Tanks



Photo Number: 16

Photo Description: Open Resin Drums Outside Mixing Room



Photo Number: 17

Photo Description: Mixing Room Dust Collector



Photo Number: 18

Photo Description: Pultrusion Dust Collector



Photo Number: 19

Photo Description: Mixing Room



Photo Number: 20

Photo Description: Spent Side of Acetone Hut



Photo Number: 21

Photo Description: Pultrusion Puller #3



Photo Number: 22

Photo Description: Pultrusion Pullers #5 and #6



Photo Number: 23

Photo Description: Burnham and Cleaver Brooks Boilers



Photo Number: 24

Photo Description: French Oil Press