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

7/1/2013

Certified Mail

Perry Bennett
MFG, Composite Systems
2925 MFG Place
Box 675
Ashtabula, OH 44004

Facility ID: 0204010230
Permit Number: P0111971
County: Ashtabula

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 5/20/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Facility ID:	0204010230
Facility Name:	MFG, Composite Systems
Facility Description:	Reinforced plastic composite products manufacturing
Facility Address:	2925 MFG Place Box 675 Ashtabula, OH 44004 Ashtabula County
Permit:	P0111971, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Star Beacon on 05/23/2013. The comment period ended on 06/27/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
MFG, Composite Systems

Facility ID:	0204010230
Permit Number:	P0111971
Permit Type:	Renewal
Issued:	7/1/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
MFG, Composite Systems

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(1) The permittee shall comply with all applicable provisions under 40 CFR Part 63, Subpart WWWW, including the following sections: 20

(1) The permittee shall comply with all the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections: 20

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Authorization

Facility ID: 0204010230
Facility Description: Reinforced plastic composite products manufacturing
Application Number(s): A0046092, A0047179
Permit Number: P0111971
Permit Description: Renewal TV PTO for reinforced plastic composite products manufacturing facility.
Permit Type: Renewal
Issue Date: 7/1/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0084100

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

MFG, Composite Systems
2925 MFG Place
Box 675
Ashtabula, OH 44004

Ohio Environmental Protection Agency (EPA)District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or

local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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 (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required

to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which

the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit 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 this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio

EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Volatile Organic Compound (VOC) emission limitation:

   a) Pursuant to OAC rule 3745-31-05(D), the combined VOC emissions from the following emissions units at this facility shall not exceed 230 tons/year, based upon a rolling, 12-month summation:

      K003, K004, P006, P007, P012, P014, P015, P016, P017, P018, P019, P022, P023, P024, P029, P030, P031, P032, P033, P037, P038, P040, P042, P043, P044, P045, P046, P048, P049, P051, P066, P068, P069, P070, P071, P072, P073, P074, and P075.

   b) The permittee shall maintain monthly records of the following information for the emissions units listed above:

      (1) The total VOC emissions during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit, in tons. Monthly emissions shall be calculated in accordance with Section C of this permit.

   c) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the rolling, 12-month VOC emission limitation for this facility.

      These reports shall be submitted in accordance with the reporting requirements outlined in the Standard Terms and Conditions in section A of this permit.

3. The following operations at this facility are subject to OAC rule 3745-21-25: Compression/injection molding, Sheet molding compound (SMC) manufacturing, Bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, VOC-containing materials storage, and repair operations on reinforced plastic composites parts that are manufactured at the facility.

   If the combined VOC emissions from SMC manufacturing (P007, P066, & P070), BMC manufacturing and mixing (P029, P040, P043, P044, P045, P048 & P075) ever equal or exceed 100 tons/year, these emissions units shall be subject to the VOC control requirements listed in OAC rule 3745-21-25(D)(3).

   a) Additional Terms and Conditions

      (1) The permittee shall meet the work practice standards in Table 1 of this rule for the affected operations:

Type of Operation	Work Practice Standards
Compression molding	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4

Type of Operation	Work Practice Standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 lb/gal, except cleaners used in closed systems and cleaners used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage operation	Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
SMC manufacturing operations	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4
All mixing or BMC manufacturing operations	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4

(2) The permittee has accepted a federally enforceable limit to demonstrate VOC emissions will remain below 230 tons/year.

b) Monitoring and Record Keeping Requirements

(1) The permittee shall keep the following records:

a. a copy of each applicability notification and compliance status report submitted to comply with this rule, including all supporting documentation; and

b. a certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule.

(2) The permittee shall retain the records required by this rule for a period of not less than 5 years. These records shall be made available to the director or any authorized representative of the director for review during normal business hours.

c) Reporting Requirements

(1) The permittee shall submit semi-annual compliance reports containing the following information:

a. If there were no deviations from any VOC emission limitations, operating limits and/or work practice standards in Table 1 of this rule, a statement that there were no deviations during the reporting period;

b. For each deviation from any VOC emission limitations, operating limits, and/or work practice standards, the compliance report shall contain:

i. the total operating time of each affected operation during the reporting period; and

ii. information on the number, duration, and cause of deviations (including unknown cause, if applicable) and the corrective actions taken.

(2) The permittee shall report any exceedance of the 100 tons/year VOC emissions threshold listed in B.3.

(3) These reports shall be submitted in accordance with the reporting requirements outlined in the Standard Terms and Conditions in section A of this permit.

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P006, P007, P012, P014, P015, P016, P017, P018, P019, P022, P023, P024, P029, P030, P031, P032, P033, P037, P038, P040, P042, P043, P044, P045, P046, P048, P049, P051, P066, P068, P069, P070, P071, P072, P074, and P075. The complete MACT requirements including the MACT General Provisions may be access via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District office.

a) The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 15 of 40 CFR Part 63, Subpart WWWW. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart WWWW and Subpart A.

[Authority for term: 40 CFR Part 63, Subpart WWWW]

b) Additional Terms and Conditions

(1) The permittee shall comply with all applicable provisions required under 40 CFR Part 63, Subpart WWWW, including but not limited to the following sections:

63.5790(b) & (c)	Applicability and affected sources
63.5835(a)	General Compliance Requirements
63.5900(a)(4), & (b)	Continuous Compliance Requirements

[Authority for term: 40 CFR Part 63, Subpart WWWW]

c) Operational Restrictions

(1) The permittee shall comply with all applicable provisions under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5805(b); and Table 4, 1-8	Work Practice Standards

[Authority for term: 40 CFR Part 63, Subpart WWWW]

d) Monitoring and Record Keeping Requirements

(1) The permittee shall comply with all the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5915(a)(1) &(d)	Notifications & Compliance Statements
63.5920	Record Retention

[Authority for term: 40 CFR Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart WWWW, within the time periods specified in each section.

63.5910(a)	Reporting Requirements
63.5910(b)(3)-(5)	Report Submission
63.5910(c)(1), (2), (3), & (5)	Required Information
63.5910(f)	Exceedance Reports
63.5910(g)	Deviation Reports

[Authority for term: 40 CFR Part 63, Subpart WWWW]

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products: K003, and K004. The complete MACT requirements including the MACT General Provisions may be access via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District office.

a) The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart PPPP. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart PPPP and Subpart A.

[Authority for term: 40 CFR Part 63, Subpart PPPP]

b) Additional Terms and Conditions

(1) The permittee shall comply with all applicable provisions required under 40 CFR 63, Subpart PPPP, including the following sections:

63.4482(a), (b)(1)-(4), & (e)	Applicability and affected sources
63.4490(b)(1)	0.16 lb organic HAP/lb coating solids
63.4500(a)(1) & (b)	General Compliance Requirements
63.4542(a)-(c)	Continuous Compliance Requirements
63.4491(a) or (b)	Compliant Material or Emission Rate Without Add-on Controls Option

[Authority for term: 40 CFR Part 63, Subpart PPPP]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4530(a)	Record Keeping
63.4530(b)	MSDS, formulation data, supplier information
63.4530(c)	Calculations
63.4530(d)	Material identification
63.4530(e) & (f)	Mass fraction of organic HAP, coating solids
63.4530(h)	Deviations

[Authority for term: 40 CFR Part 63, Subpart PPPP]

e) Reporting Requirements

(1) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart PPPP, within the time periods specified in each section.

63.4510(a)	Notifications
63.4520(a)(1), (2) & (3)	Semi-annual Compliance Reports
63.4520(a)(4), (5) & (6)	Deviation Reports
63.4531(a)-(c)	Record Retention

[Authority for term: 40 CFR Part 63, Subpart PPPP]

6. The following insignificant emissions units are located at this facility:

   B006-B008: Emergency Generators 1-3.

   Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18 and/or 3745-21. [Authority for term: OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group – Front Line Coating Booths - K003, K004

EU ID	Operations, Property and/or Equipment Description
K003	Prime coat spray booth w/particulate filters and 2.5 mmbtu/hr drying oven
K004	Top coat spray booth w/particulate filters and 3.0 mmbtu/hr drying oven

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0110952, issued 1/22/2013)	Volatile organic compound (VOC) emissions from all coatings and cleanup materials from each coating booth shall not exceed 14 lbs/hr and 40.1 tpy
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Sections B.2.a), B.2.b) and B.2.c).
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
d.	40 CFR Part 63, Subpart PPPP	See Facility-Wide Terms & Conditions Section B.5.

(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever these emission units are in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rules 3745-17-11(C) and 3745-77-07(A)(1)]]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for each coating booth:

a. the name and identification of each coating and cleanup material;

b. the number of gallons of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in lbs/gal, as applied;

d. the amount of cleanup material recovered, in lbs;

e. the total monthly VOC emissions from all coatings and cleanup materials employed, in lbs {sum of (b x c)-d}; and

f. the total annual VOC emissions from all coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

(3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturers recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

(6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rules 3745-17-11(C) and 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rules 3745-17-11(C) and 3745-77-07(C)(1)]

(3) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31st of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
VOC emissions from all coatings and cleanup materials from each coating booth shall not exceed 14 lbs/hr and 40.1 tpy

Applicable Compliance Method:
The short term emission limitation reflects the uncontrolled PTE and was derived by multiplying the maximum VOC content by the maximum coating usage:

lbs/hr = (4.0 lbs VOC/gal)(3.5 gals/hr)

Compliance with the annual emission limitation shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group – SMC Machines: P007, P066, and P070

EU ID	Operations, Property and/or Equipment Description
P007	Sheet molding compound machine 1
P066	Sheet molding compound machine 2 (Research Facility)
P070	SMC Machine 3, carbon fiber mold machine (Research Facility)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0110952, issued 1/22/2013)	VOC emissions shall not exceed the following: P007: 3.0 lbs/hr and 9.9 tpy; P066: 2.04 lbs/hr and 8.93 tpy; and P070: 3.77 lbs/hr and 9.9 tpy.
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Section B.2.
c.	OAC rule 3745-21-25(D)(1)	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4 See Facility-Wide Terms and Conditions Sections B.3 and B.4.
d.	OAC rule 3745-21-25(D)(8)	Exempt. VOC emissions are less than 25.0 tons per rolling, 12-month period.
e.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Section B.4.

(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for each emissions unit, therefore, no monitoring or record keeping is required to document compliance with this emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for each emissions unit:

a. the name and identification of each SMC produced;

b. the amount of each SMC produced for each type of SMC product, in lbs;

c. the VOC/monomer content of each SMC employed, in percent by weight;

d. the monthly operating hours; and

e. the monthly VOC emissions, in tons (calculated by multiplying the hourly emission rate (b)(1)a) by the actual operating hours and the conversion factor (1 ton/2,000 lbs)

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit annual reports that specify the total VOC emissions for each emissions unit for the previous calendar year. These reports shall be submitted by January 31st of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
VOC emissions shall not exceed:

3.0 lbs/hr and 9.9 tpy from P007;

2.04 lbs/hr and 8.93 tpy from P066; and

3.77 lbs/hr and 9.9 tpy from P070.

Applicable Compliance Method:
The hourly emission rate for P007 was established during emission testing conducted September 12-14, 2006, in accordance with 40 CFR Part 60, Appendix A, Methods 25A and 204.

The hourly emission rates for P066 and P070 were determined using the open line area (A, ft^2) for each machine and the "American National Standard for Estimating Emission Factors from Open Molding Composite Processes and Other Composite Processes," equation for SMC production (ANSI/ACMA/ICPA UEF-1-2011a):

lbs/hr = 0.1457(A) – 0.1454

Compliance with the annual limitation for each emissions unit shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Mixers: P029, P040, P043, P044, P045, P048

EU ID	Operations, Property and/or Equipment Description
P029	Mixer 3: SMC paste production, vented to baghouse
P040	Mixer 4: Nano mixer, vented to baghouse
P043	Mixer 6: SMC paste production, vented to baghouse
P044	Mixer 7: liquid molding compound (wet mix), vented to baghouse
P045	Mixer 8: liquid molding compound (wet mix), vented to baghouse
P048	Bead Blender vented to baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a	OAC rule 3745-31-05(A)(3) (PTI P0110952, issued 1/22/2013)	Volatile organic compound (VOC) emissions from each mixer shall not exceed 0.95 lb/hr and 4.16 tons/year. Particulate emissions (PE) from each mixer shall not exceed 0.12 lb/hr. Visible particulate emissions from the baghouse exhaust shall not exceed 5% opacity, as a 6-minute average. See b)(2)a and b)(2)b.
b	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Section B.2.
c	OAC rule 3745-21-25(D)(1)	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See Facility-Wide Terms and Conditions Sections B.3 and B.4.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Section B.4.

(2) Additional Terms and Conditions

a. The emissions from these emissions units shall be vented to the baghouse during the addition of filler material into the mix vessel.

b. The hourly emission limitations for VOC and PE are based on the potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information monthly for each mixer:

a. the company identification for each material used in the mixers;

b. the number of pounds of each material used;

c. the dry solids content of each material, expressed as a decimal fraction, by weight;

d. the total particulate emission rate, in lbs (as calculated in section f)(1)b);

e. the VOC/monomer content of each material, expressed as a decimal fraction, by weight;

f. the total VOC emission rate for each mixer, in lbs (as calculated in section f)(1)a); and

g. the total annual VOC emission rate for each mixer, in tons/year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

(2) The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions units are in operation or within a range established during the most recent performance test that demonstrated the emissions units were in compliance.

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

(3) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31st of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
VOC emissions from each mixer shall not exceed 0.95 lb/hr and 4.16 tons/year.

Applicable Compliance Method:
The hourly emission limitation reflects the uncontrolled potential to emit and was derived by multiplying the maximum mix rate (lbs/hr) by the VOC/monomer content (%, by weight) and the emission factor (lb VOC/lb available VOC) developed during the 6/19/2007 stack test on mixer 8:

lb/hr = (4,000 lbs/hr)(25%)(0.00095 lb VOC/lb)

Compliance with the annual emission limitation shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

If required, compliance with these emission limitations shall be demonstrated by emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Method(s) 25A or 18, or American Society for Testing and Materials (ATSM) D6420-99, as appropriate, or an equivalent alternate method approved by the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

b. Emission Limitation:
PE from each mixer shall not exceed 0.12 lb/hr.

Applicable Compliance Method:
The hourly emission limitation reflects the potential to emit and was derived by multiplying the maximum dry solids throughput rate (lbs/hr) by the percent dry solids/mix(%), by the emission factor for uncontrolled PE for a semi-covered or covered mixer (AP 42, Chapter 6.4 (5/83)), and the baghouse control efficiency:

lb/hr = (4,000 lbs/hr)(30%)(0.01 lbs PE/lb dry solids)(1 – 0.99)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

c. Emission Limitation:
Visible particulate emissions from the baghouse exhaust shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

g) Miscellaneous Requirements
(1) None.

4. Emissions Unit Group – Compression Mold Presses: Group 1 (P022, P023); Group 2 (P071, P072);Group 3 (P016, P017, P018, P024, P038, P069); Group 4 (P032, P037, P046, P051, P074); Group 5 (P019, P030);Group 6 (P014, P015); Group 7 (P006, P012, P042, P068); and Group 8 (P031, P033, P049)

EU ID	Operations, Property and/or Equipment Description	EU ID	Operations, Property and/or Equipment Description
P006	2000 ton press 225	P030	1500 ton press 226
P012	1500 ton press 227	P071	Press 19 --from Premier Molding
P042	2000 ton press 224	P072	Press 22 (P016) from Premier Molding
P068	2000 ton press 5 (Research Facility)	P022	220 ton press 204
P014	1500 ton press 222	P023	220 ton press 205
P015	1500 ton press 221	P031	2850 ton press 228
P016	880 ton press 202	P033	2850 ton press 229
P017	565 ton press 201	P049	1000 ton press 238
P018	565 ton press 203	P032	1500 ton press 231
P024	227 ton press 219	P037	1000 ton press 233
P038	500 ton press 209	P046	2800 ton press 210
P069	500 ton press (Research Facility)	P051	1000 ton press 239
P019	450 ton press 206	P074	500 ton press 240

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0110952, issued 1/22/2013)	VOC emissions shall not exceed the following from each press within each group: Group 1 presses: 0.45 lb/hr and 1.97 tpy; Group 2 presses: 0.71 lb/hr and 3.09 tpy; Group 3 presses: 0.81 lb/hr and 3.55 tpy; Group 4 presses: 1.10 lbs/hr and 4.80 tpy; Group 5 presses: 1.43 lbs/hr and 6.24 tpy; Group 6 presses: 1.70 lbs/hr and 7.42 tpy; Group 7 presses: 2.24 lbs/hr and 9.79 tpy; and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Group 8 presses: 3.48 lbs/hr and 15.24 tpy.
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Sections B.2.a), B.2.b) and B.2.c).
c.	OAC rule 3745-21-25(D)(1)	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4 See Facility-Wide Terms and Conditions Sections B.3 and B.4.
d.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Section B.3.

(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information monthly for each press:

a. the name and identification of each sheet mold compound (SMC) and each liquid mold compound (LCM) used;

b. the amount of each SMC employed, in lbs;

c. the amount of each LCM employed, in lbs;

d. the VOC/monomer content of each SMC employed, expressed as a decimal fraction, by weight;

e. the VOC/monomer content of each LCM employed, expressed as a decimal fraction, by weight;

f. the total VOC emission rate for each press, in lbs $\{c \times ((0.0072 \times e) - 0.0008)\} + (b \times d \times 0.015)$; and

g. the total annual VOC emission rate for each press, in tons/year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit annual reports that specify the total VOC emissions for each press for the previous calendar year. These reports shall be submitted by January 31st of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
VOC emissions shall not exceed the following from each press within each group

Group 1 presses: 0.45 lb/hr and 1.97 tpy;
Group 2 presses: 0.71 lb/hr and 3.09 tpy;
Group 3 presses: 0.81 lb/hr and 3.55 tpy;
Group 4 presses: 1.10 lbs/hr and 4.80 tpy;
Group 5 presses: 1.43 lbs/hr and 6.24 tpy;
Group 6 presses: 1.70 lbs/hr and 7.42 tpy;
Group 7 presses: 2.24 lbs/hr and 9.79 tpy; and
Group 8 presses: 3.48 lbs/hr and 15.24 tpy.

Applicable Compliance Method:
The hourly emission limitations reflect the uncontrolled potential to emit and were derived by multiplying the worst case throughput (lbs monomer molder/hour) by the the "American National Standard for Estimating Emission Factors from Open Molding Composite Processes and Other Composite Processes," unified emission factor (UEF) for compression molding of SMC, 1.5% of the styrene monomer content in the SMC material. (ANSI/ACMA/ICPA UEF-1-2011a);

Group 1: (30 lbs/hr)(0.015) = 0.45 lb/hr;
Group 2: (47 lbs/hr)(0.015) = 0.71 lb/hr;
Group 3: (54 lbs/hr)(0.015) = 0.81 lb/hr;
Group 4: (73 lbs/hr)(0.015) = 1.10 lbs/hr;
Group 5: (95 lbs/hr)(0.015) = 1.43 lbs/hr;
Group 6: (113 lbs/hr)(0.015) = 1.70 lbs/hr;
Group 7: (149 lbs/hr)(0.015) = 2.24 lbs/hr; and
Group 8: (232 lbs/hr)(0.015) = 3.48 lbs/hr.

Compliance with the annual emission limitation shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

g) Miscellaneous Requirements

(1) None.

5. P073, Parts preparation/inspection

Operations, Property and/or Equipment Description:

Parts preparation/inspection

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0110952, issued 1/22/2013)	Volatile organic compound (VOC) emissions shall not exceed 5.0 lbs/hr and 21.9 tpy.
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Sections B.2.a), B.2.b) and B.2.c).
c.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Sections B.4.a), B.4.b), B.4.c), B.4.d) and B.4.e).

(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. the company identification of each solvent employed;

b. the amount of each solvent used, in gallons;

c. the VOC content of each solvent used, in lbs/gallon; and

d. the total monthly VOC emissions (b x c) from all solvents used, in lbs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31st of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
VOC emissions shall not exceed 5.0 lbs/hour and 21.9 tpy.

Applicable Compliance Method:
Compliance with these emission limitations shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110952]

g) Miscellaneous Requirements

(1) None.

6. P075, Mixer 9 (SMC 3)

Operations, Property and/or Equipment Description: Large Resin Paste Mixer (SMC)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001. (PTI P0112554, issued 3/11/2013)	Particulate emissions (PE) shall not exceed 0.01 gr/dscf. Visible PE from the exhaust stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average. See b)(2)a, b)(2)b and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)d.
c.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 3.8 lbs/hr
d.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See facility-wide terms and conditions section B.2.
e.	OAC rule 3745-21-25(D)(1)	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See facility-wide terms and conditions sections B.3 and B.4.
f.	OAC rule 3745-17-07(A)(1)	Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		This emission limitation shall be effective once the December 1, 2006 version of the SIP for OAC rule 3745-31-05(A)(3) is approved by USEPA.
g.	OAC rule 3745-17-11 Table 1	PE shall not exceed 7.37 lbs/hr. This emission limitation shall be effective once the December 1, 2006 version of the SIP for OAC rule 3745-31-05(A)(3) is approved by USEPA.
h.	40 CFR Part 63, Subpart WWWW	See facility-wide terms and conditions section B.4.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse during the addition of filler material into the mix vessel.

b. The short-term emission limitations for VOC and PE are based on the potential to emit (PTE) for this emissions unit, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the controlled potential to emit is less than 10 tons/year, and the controls are necessary to comply with the emission limit established pursuant to OAC rule 3745-17-11(B).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information monthly:

a. the company identification for each material used;

b. the number of pounds of each material used;

c. the VOC/monomer content of each material, expressed as a decimal fraction, by weight;

d. the total VOC emission rate, in lbs (as calculated in section f)(1)c); and

e. the total annual VOC emission rate, in tons/year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112554]

(2) The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions units are in operation or within a range established during the most recent performance test that demonstrated the emissions units were in compliance.

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(4) Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

i. the date and time the deviation began;

ii. the magnitude of the deviation at that time;

iii. the date the investigation was conducted;

iv. the name(s) of the personnel who conducted the investigation; and

v. the findings and recommendations.

(5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(6) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112554]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112554]

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31st of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112554]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
PE shall not exceed 0.01 gr/dscf.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:
Visible PE from the exhaust stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112554]

c. Emission Limitation:
VOC emissions shall not exceed 3.8 lbs/hr.

Applicable Compliance Method:
The hourly emission limitation reflects the uncontrolled potential to emit and was derived by multiplying the maximum mix rate (lbs/hr) by the emission factor (lb VOC/lb available VOC) developed during the 6/19/2007 stack test on mixer 8:

lb/hr = (4,000 lbs/hr)(0.00095 lb VOC/lb)

If required, compliance with this emission limitation shall be demonstrated by emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25A or 18, or American Society for Testing and Materials (ATSM) D6420-99, as appropriate, or an equivalent alternate method approved by the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112554]

d. Emission Limitation:
Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

This emission limitation shall be effective once the December 1, 2006 version of the SIP for OAC rule 3745-31-05(A)(3) is approved by USEPA.

Applicable Compliance Method:
If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-17-07(A) and 3745-77-07(C)(1) and PTI P0112554]

e. Emission Limitation:
PE shall not exceed 7.37 lbs/hr.

This emission limitation shall be effective once the December 1, 2006 version of the SIP for OAC rule 3745-31-05(A)(3) is approved by USEPA.

Applicable Compliance Method:
The hourly emission limitation was derived from the following equation from OAC rule 3745-17-11, Table 1:

$E = 4.10\ (P)^{0.67}$

where:

E = emission rate, in lbs/hr; and

P = total weight of all fillers, in tons/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rules 3745-17-11 and 3745-77-07(C)(1) and PTI P0112554]

g) Miscellaneous Requirements

(1) None.