



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

7/1/2013

Certified Mail

Jerry Lillie
Hadlock Plastics LLC
110 North Eagle St.
Geneva, OH 44041-1196

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204030272
Permit Number: P0113422
Permit Type: OAC Chapter 3745-31 Modification
County: Ashtabula

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Hadlock Plastics LLC**

Facility ID: 0204030272
Permit Number: P0113422
Permit Type: OAC Chapter 3745-31 Modification
Issued: 7/1/2013
Effective: 7/1/2013



Division of Air Pollution Control
Permit-to-Install
for
Hadlock Plastics LLC

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	7
9. Reporting Requirements	7
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	9
14. Public Disclosure	9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	24
1. P006, 110 TON PRESS	25
2. P007, 110 TON PRESS	30
3. P009, 300 TON PRESS	35
4. P011, 700 TON PRESS	40



Final Permit-to-Install
Hadlock Plastics LLC
Permit Number: P0113422
Facility ID: 0204030272
Effective Date: 7/1/2013

Authorization

Facility ID: 0204030272
Facility Description: FRP Manufacturing and Coating
Application Number(s): A0046968
Permit Number: P0113422
Permit Description: Fiberglass reinforced plastic (FRP) Mold Presses: Chapter 31 modification for increasing allowable VOC emissions
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$800.00
Issue Date: 7/1/2013
Effective Date: 7/1/2013

This document constitutes issuance to:

Hadlock Plastics LLC
110 North Eagle St.
Geneva, OH 44041-1196

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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 Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally
Director



Final Permit-to-Install
Hadlock Plastics LLC
Permit Number: P0113422
Facility ID: 0204030272
Effective Date: 7/1/2013

Authorization (continued)

Permit Number: P0113422

Permit Description: Fiberglass reinforced plastic (FRP) Mold Presses: Chapter 31 modification for increasing allowable VOC emissions

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P006
Company Equipment ID:	110 TON PRESS
Superseded Permit Number:	02-22215
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	110 TON PRESS
Superseded Permit Number:	02-22215
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	300 TON PRESS
Superseded Permit Number:	02-22215
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	700 TON PRESS
Superseded Permit Number:	02-22215
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Hadlock Plastics LLC
Permit Number: P0113422
Facility ID: 0204030272
Effective Date: 7/1/2013

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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.



- c) 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 ORC section 3704.08.
 - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



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

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



Final Permit-to-Install
Hadlock Plastics LLC
Permit Number: P0113422
Facility ID: 0204030272
Effective Date: 7/1/2013

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) B.18.
2. OAC rule 3745-31-05(D)(1)(a) - Federally enforceable facility-wide VOC emission limitation:
 - a) The total emissions of volatile organic compounds (VOC) emitted from all emissions units at this facility shall not exceed 99 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

All emissions units that emit VOC emissions are listed below:

Non-insignificant emissions units: P002, P004 – P017, P101, R001 – R011 and R101.

Insignificant emissions units: B001 (Air Makeup Heating), L001 (Parts cleaner), P018 (15 HP Mixer), P019 (7 HP Mixer), P020 (Dough Mixer), R012 (Paint touch up, aerosol spray paint can)

In lieu of calculating actual monthly VOC emissions from all insignificant emissions units, a value (0.1 ton VOC/month) shall be added each month to the rolling, 12-month summation of monthly emissions. This value was determined by summing the potential VOC emissions from each of the above insignificant emissions units and adding a conservative margin of safety (over 3X the combined PTEs of all insignificant emissions units). This margin of safety will allow for future installations of new VOC insignificant emissions units exempted from permitting (de minimis or PTI exemptions).
3. Facility-wide VOC emissions limitation – Monitoring and/or Recordkeeping Requirements:
 - a) The permittee shall maintain monthly records of the following information:
 - (1) The rolling, 12-month summation of tons of VOC emissions, calculated by adding the current month's VOC emissions from all emissions units at this facility to the VOC emissions for the preceding eleven calendar months from all emissions units at this facility.
4. Federally enforceable facility-wide operational restrictions for limiting facility-wide VOC emissions to not to exceed 99 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The permittee shall not exceed any of the operational restrictions in Table 1 below. The following emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of gelcoat, resin and cleanup usages, upon issuance of this permit.



Table 1, Facility-wide operational restrictions

	Emissions units	Types of operations	Operational restrictions
a.	P005 – P017	Closed molding machines	<p>VOC monomer usage restriction: 1,396 tons of VOC monomer or an amount calculated below, used in all closed molding machines combined, emissions units P005 – P017, based on a rolling, 12-month summation of monthly usage rates.</p> <p>Calculated amount:</p> <p>VOC monomer usage restriction (tons) = Maximum usage of VOC monomer (1,396) – ((1/16.48)(Epoxy SMC usage, in tons, based on a rolling, 12-month summation of monthly usage rates))</p> <p>At the end of each month, whenever epoxy SMC material was used, or was used in the preceding 11-months, in emissions units P005 – P017, the permittee must calculate a VOC monomer usage restriction and must be in compliance with it.</p> <p>For every 16.48 tons of Epoxy SMC material used in closed molding machines, P005 – P017, 1 ton of VOC monomer will be subtracted from, and will reset, the operational restriction above.</p>
b.	P005 – P017	Closed molding machines	<p>Epoxy SMC material usage restriction: 23,011 tons of Epoxy SMC material or an amount calculated below, used in all closed molding machines combined, emissions units P005 – P017, based on a rolling, 12-month summation of monthly usage rates.</p> <p>Calculated amount:</p> <p>Epoxy SMC material usage restriction (tons) = Maximum usage of Epoxy SMC material (23,011) – (16.48)(VOC monomer usage, in tons, based on a rolling, 12-month summation of monthly usage rates)</p> <p>At the end of each month, whenever VOC monomer was used, or was used in the preceding 11-months, in emissions units P005 – P017, the permittee must calculate an Epoxy SMC material usage restriction and must be in compliance with it.</p> <p>For every (1) ton of VOC monomer used in closed molding machines, P005 – P017, 16.48 tons of Epoxy SMC material will be subtracted from, and will reset, the operational restriction above.</p>
c.	P005 – P017	Closed molding machines	<p>Maximum usage: 7,050 tons of Phenolic SMC material, used in all closed molding machines combined, emissions units P005 – P017, based on a rolling, 12-month summation of monthly usage rates</p>



d.	P002 and P101	Resin transfer molding	Maximum usage: 36.5 tons of VOC monomer, used in all resin transfer molding combined, emissions units P002 and P101, based on a rolling, 12-month summation of monthly usage rates
e.	R101, R001, R002, R008, R009	Open molding – gelcoat application	<p>Maximum usage: 46.5 tons of gelcoat, used in all open molding areas combined, emissions units R101, R001, R008 and R009, based on a rolling, 12-month summation of monthly usage rates</p> <p>Note: For this restriction, a ton of gelcoat is before the additions of additives such as powders, fillers, glass...etc.</p>
f.	R101, R001, R002, R008, R009	Open molding – manual application	<p>Maximum usage: 83 tons of resin, used in all open molding areas combined, emissions units R101, R001, R008 and R009, based on a rolling, 12-month summation of monthly usage rates</p> <p>Note: For this restriction, a ton of resin is before the additions of additives such as powders, fillers, glass...etc.</p>
g.	R101, R001, R002, R008, R009	Open molding – sprayup, non-atomized application	<p>Maximum usage: 83 tons of resin, used in all open molding areas combined R101, R001, R002, R008 and R009 using sprayup, non-atomized application, based on a rolling, 12-month summation of monthly usage rates</p> <p>Note: For this restriction, a ton of resin is before the additions of additives such as powders, fillers, glass...etc.</p>
h.	R003 – R007, R010, R011	Surface coating	Maximum usage: 7,200 gallons of coating from all surface coating operations combined, emissions units R003 – R007, R010 and R011, based on a rolling, 12-month summation of monthly usage rates
i.	R003 – R007, R010, R011	Surface coating	Maximum allowable average weighted VOC content limit: 6.2 lbs VOC/gal of coating, based on a rolling, 12-month average of coatings
j.	R003 – R007, R010, R011	Surface coating – cleanup	Maximum usage: 3,780 gallons of cleanup from all surface coating operations combined, emissions units R003 – R007, R010 and R011, based on a rolling, 12-month summation of monthly usage rates
k.	R003 – R007, R010, R011	Surface coating – cleanup	Maximum allowable VOC content for each cleanup: 0.42 lb VOC/gal of cleanup
l.	P004	Facility – wide cleanup	Maximum usage: 7,650 gallons of cleanup for all facility-wide cleanup, based on a rolling, 12-month summation of monthly usage rates
m.	P004	Facility – wide cleanup	Maximum allowable VOC content for each cleanup: 0.42 lb VOC/gal of cleanup



5. Facility-wide operational restrictions for limiting facility-wide VOC emissions – Monitoring and/or Recordkeeping Requirements:
- a) The permittee shall maintain monthly records of the following information:
 - (1) For compression molding machines, emissions units P005 – P017:
 - (a) A rolling, 12-month summation of the total amount of tons of VOC monomer (available VOC and organic HAPs as contained in mold compound) used in emissions units P005 – P017 combined, calculated by adding the current month's combined usage amount of VOC monomer from emissions units P005 – P017 to the preceding eleven calendar months of combined usage amount of VOC monomer from emissions units P005 – P017.
 - (b) Calculate a VOC monomer usage restriction, by multiplying the total amount of Epoxy SMC material used, as calculated in B.5.a)(2)(a) below, by (1/16.48) and then subtract this product from 1,396 tons of VOC monomer. This calculation shall be performed only if Epoxy SMC material has been used in emissions units P005 – P017 within the past 12-months.
 - (2) For compression molding machines, emissions units P005 – P017:
 - (a) A rolling, 12-month summation of the total amount of tons of Epoxy SMC material used in emissions units P005 – P017 combined, calculated by adding the current month's combined usage amount of Epoxy SMC material from emissions units P005 – P017 to the preceding eleven calendar months of combined usage amount of Epoxy SMC material from emissions units P005 – P017.
 - (b) Calculate an Epoxy SMC material usage restriction, by multiplying the total amount of VOC monomer used, as calculated in B.5.a)(1)(a) above, by (16.48) and then subtract this product from 23,011 tons of Epoxy SMC material. This calculation shall be performed only if VOC monomer has been used in emissions units P005 – P017 within the past 12-months.
 - (3) For compression molding machines, emissions units P005 – P017:
 - (a) A rolling, 12-month summation of the total amount of tons of Phenolic SMC material used in emissions units P005 – P017 combined, calculated by adding the current month's combined usage amount of Phenolic SMC material from emissions units P005 – P017 to the preceding eleven calendar months of combined usage amount of Phenolic SMC material from emissions units P005 – P017.
 - (4) For resin transfer molding, emissions units P002 and P101:
 - (a) A rolling, 12-month summation of the total amount of tons of VOC monomer (available VOC and organic HAPs as contained in mold compound) used in emissions units P002 and P101 combined, calculated by adding the current month's combined usage amount of VOC monomer from emissions units P002



and P101 to the preceding eleven calendar months of combined usage amount of VOC monomer from emissions units P002 and P101.

- (5) For open molding operations – gelcoat application, emissions units R101, R001, R002, R008 and R009:
 - (a) A rolling, 12-month summation of the total amount of tons of gelcoat used in emissions units R101, R001, R002, R008 and R009 combined, calculated by adding the current month's combined gelcoat usage amount from emissions units R101, R001, R002, R008 and R009 to the preceding eleven calendar months of combined gelcoat usage amount from emissions units R101, R001, R002, R008 and R009; and
 - (b) The weight percent of VOC monomer (available VOC and organic HAP) in each gelcoat, as applied (styrene, methyl methacrylate, etc., plus any extra added by the molder).
- (6) For open molding operations – resin manual application, emissions units R101, R001, R002, R008 and R009:
 - (a) A rolling, 12-month summation of the total amount of tons of resin used in emissions units R101, R001, R002, R008 and R009 combined, calculated by adding the current month's combined resin usage amount from emissions units R101, R001, R002, R008 and R009 to the preceding eleven calendar months of combined resin usage amount from emissions units R101, R001, R002, R008 and R009; and
 - (b) The weight percent of VOC monomer (available VOC and organic HAP) in each resin, as applied, (styrene, methyl methacrylate, etc., plus any extra added by the molder).
- (7) For open molding operations – resin sprayup, non-atomized application, emissions units R101, R001, R002, R008 and R009:
 - (a) A rolling, 12-month summation of the total amount of tons of resin used in emissions units R101, R001, R002, R008 and R009 combined, calculated by adding the current month's combined resin usage amount from emissions units R101, R001, R002, R008 and R009 to the preceding eleven calendar months of combined resin usage amount from emissions units R101, R001, R002, R008 and R009; and
 - (b) The weight percent of VOC monomer (available VOC and organic HAP) in each resin, as applied, (styrene, methyl methacrylate, etc., plus any extra added by the molder).
- (8) For surface coating operations, emissions units R003 – R007, R010 and R011:
 - (a) A rolling, 12-month summation of the total gallons of coatings used in emissions units R003 – R007, R010 and R011 combined, calculated by adding the current



month's combined coating usage from emissions units R003 – R007, R010 and R011 to the preceding eleven calendar months of combined coating usage from emissions units R003 – R007, R010 and R011; and

- (b) Average weighted VOC content, in lbs VOC/gal, calculated by using the following equation:

$$C_{VOC,A} = \frac{\sum_{i=1}^n C_{VOC,i} L_{Ci}}{\sum_{i=1}^n L_{Ci}}$$

where:

$C_{VOC,A}$ = the average weighted VOC content of all coatings, applied during each rolling, 12-month average from emission units R003 – R007, R010 and R011;

$C_{VOC,i}$ = VOC content of coating (i);

L_{Ci} = liquid volume of coating (i);

(i) = each coating applied during each rolling, 12-month period; and

(n) = total number of coatings that were applied during each rolling, 12-month period.

- (9) For surface coating operations, emissions units R003 – R007, R010 and R011:
 - (a) A rolling, 12-month summation of the total gallons of cleanup used in emissions units R003 – R007, R010 and R011 combined, calculated by adding the current month's combined cleanup usage from emissions units R003 – R007, R010 and R011 to the preceding eleven calendar months of combined cleanup usage from emissions units R003 – R007, R010 and R011; and
 - (b) The VOC content, in lbs VOC/gal, of each cleanup material.
- (10) For facility-wide cleanup, emissions unit P004:
 - (a) A rolling, 12-month summation of the total gallons of cleanup used in emissions unit P004, calculated by adding the current month's cleanup usage from emissions unit P004 to the preceding eleven calendar months of cleanup usage from emissions unit P004; and
 - (b) The VOC content, in lbs VOC/gal, of each cleanup material.



6. Facility-wide VOC emissions limitation and operational restrictions for limiting facility-wide VOC emissions – Reporting Requirements:
- a) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- (1) all exceedances of the rolling, 12-month emission limitation for VOC, in B.2;
 - (2) all exceedances of all rolling, 12-month operational restrictions for VOC monomer usages, in B.4, Table 1, facility-wide operational restrictions a and d;
 - (3) all exceedances of all rolling, 12-month operational restrictions for SMC material usages, in B.4, Table 1, facility-wide operational restrictions b and c;
 - (4) all exceedances of all rolling, 12-month operational restrictions for gelcoat and resin usages, in B.4, Table 1, facility-wide operational restrictions e, f and g;
 - (5) all exceedances of the rolling, 12-month operational restriction for surface coating usage, in B.4, Table 1, facility-wide operational restriction h;
 - (6) all exceedances of the average weighted VOC content for all surface coatings, in B.4, Table 1, facility-wide operational restriction i;
 - (7) all exceedances of all rolling, 12-month operational restrictions for cleanup usages, in B.4, Table 1, facility-wide operational restrictions j and l; and
 - (8) all exceedances of all allowable VOC content limits for cleanup, in B.4, Table 1, facility-wide operational restrictions k and m.

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

7. The following emissions units are subject to 40 CFR Part 63, Subpart WWWW: P004 – P020, R001, R002, R008, R009 and R101. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District or local air agency.
8. 40 CFR, Part 63, Subpart WWWW – Operational Restrictions for the facility-wide work practice standards:
- a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
- b) For mixing operations, the permittee shall meet the following work practice standards:
- (1) use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;



- (2) close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and
 - (3) keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
9. 40 CFR, Part 63, Subpart WWWW – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standards:
 - a) The permittee shall perform daily inspections when in operation of all containers that store HAP-containing materials, and record the following information:
 - (1) the date and reason why any required inspection was not performed;
 - (2) the date and all times when containers that store HAP-containing materials were not closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety; and
 - (3) information on the duration and cause of each deviation and the corrective action taken.
 - b) The permittee shall perform daily inspections of each mixer when resin is present in the mixing vessel, and record the following information:
 - (1) the date and reason why any required inspection was not performed;
 - (2) the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;
 - (3) the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;
 - (4) the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and
 - (5) information on the duration and cause of each deviation and the corrective action taken.
10. 40 CFR, Part 63, Subpart WWWW – Reporting Requirements for facility-wide work practice standards:
 - a) The permittee must submit the following semiannual compliance reports:
 - (1) if there are no deviations from this work practice standard in B.8.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store HAP-containing materials were closed or covered during the reporting period);
 - (2) if there were deviations with this work practice standard in B.8.a), provide the total operating time of each emissions unit during the reporting period and information on the



number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken;

- (3) if there are no deviations from the work practice standards in B.8.b)(1) – B.8.b)(3), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and
- (4) if there were deviations with the work practice standards in B.8.b)(1) – B.8.b)(3), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

- 11. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

§63.5915(a)	copy of compliance notification(s) and report(s)
§63.5915(d)	certified statement of compliance with work practice requirements
§63.5920(a) – (d)	record keeping format and retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW]

- 12. The following emissions units are subject to OAC rule 3745-21-25: P004 – P020, R001, R002, R008, R009 and R101.
- 13. OAC rule 3745-21-25 – Operational Restrictions for the facility-wide work practice standards:
 - a) For all fiberglass reinforced plastic operations, the permittee must keep all 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.
 - b) For mixing operations, the permittee shall meet the following work practice standards:
 - (1) use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;



- (2) close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and
 - (3) keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
14. OAC rule 3745-21-25 – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standards:
 - a) The permittee shall perform daily inspections when in operation of all containers that store VOC-containing materials, and record the following information:
 - (1) the date and reason why any required inspection was not performed;
 - (2) the date and all times when containers that store VOC-containing materials were not closed or covered, except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety; and
 - (3) information on the duration and cause of each deviation and the corrective action taken.
 - b) The permittee shall perform daily inspections of each mixer when resin is present in the mixing vessel, and record the following information:
 - (1) the date and reason why any required inspection was not performed;
 - (2) the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;
 - (3) the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;
 - (4) the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and
 - (5) information on the duration and cause of each deviation and the corrective action taken.
15. OAC rule 3745-21-25 – Reporting Requirements for facility-wide work practice standards:
 - a) The permittee must submit the following semiannual compliance reports:
 - (1) if there are no deviations from the work practice standard in B.13.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store VOC-containing materials were closed or covered during the reporting period); and
 - (2) if there were deviations with the work practice standard in B.13.a), provide the total operating time of each emissions unit during the reporting period and information on the



number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

- (3) if there are no deviations from the work practice standards in B.13.b)(1) – B.13.b)(3), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and
- (4) if there were deviations with the work practice standards in B.13.b)(1) – B.13.b)(3), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

- 16. The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

- 17. The following emissions units are subject to 40 CFR Part 63, Subpart P: R003 – R007, R010 and R011. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District or local air agency.



Final Permit-to-Install
Hadlock Plastics LLC
Permit Number: P0113422
Facility ID: 0204030272
Effective Date: 7/1/2013

18. State modeling requirement: Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745 114 01, will be less than 1.0 ton per year. OAC Chapter 3745 31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745 31 01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



Final Permit-to-Install
Hadlock Plastics LLC
Permit Number: P0113422
Facility ID: 0204030272
Effective Date: 7/1/2013

C. Emissions Unit Terms and Conditions



1. P006, 110 TON PRESS

Operations, Property and/or Equipment Description:

Closed Molding Press

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the 833 lbs/month and 5.0 tons/yr. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.16	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limitations/control measures no longer apply.
- b. 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 VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

- (1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each mold compound (SMC/BMC) employed;
 - b. the weight of each mold compound (SMC/BMC) employed;
 - c. the percent of VOC monomer(s), by weight, of each mold compound (SMC/BMC) employed; and
 - d. the total VOC emission rate for all mold compound used, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i + \text{EF} \sum_j^k [(W2)]_j$$

where:

W = the weight of each polyester mold compound employed, as recorded in d)(1)b;

P = the percent of VOC monomer, by weight, of each mold compound (SMC/BMC) employed, as recorded in d)(1)c;



Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each mold compound (SMC/BMC) employed.

i = a specific polyester mold compound material (SMC/BMC) employed during the month;

n = total number of polyester mold compound materials (SMC/BMC) employed during the month;

W2 = the weight of each phenolic or epoxy mold compound employed, as recorded in d)(1)b;

j = a specific phenolic or epoxy mold compound material (SMC/BMC) employed during the month;

k = total number of phenolic or epoxy mold compound materials (SMC/BMC) employed during the month; and

EF = emissions factors:

(a) For polyester resins (excluding epoxy and phenolic mold compound):

EF = 30 lbs of VOC emissions emitted / tons of VOC monomer input

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

(0.015 lb VOC/lb monomer input) x 2000 lbs/ton = EF (30 lbs VOC /tons VOC monomer input)]

(b) For epoxy resin:

EF = 1.82 lb of VOC emissions emitted / ton of epoxy mold compound material (SMC/BMC)

1.82 lb of VOC/ ton of epoxy as determined from emissions testing for the production epoxy SMC, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc..

(c) For phenolic resin:

EF = 0.28 lb of VOC emissions emitted / tons of phenolic mold compound material (SMC/BMC)

0.28 lb of VOC / tons of phenolic mold compound as determined from emissions testing, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.



- (2) The permittee shall inspect each molding machine when in operation, and record the following information:
 - a. the date and reason why any required inspection was not performed;
 - b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each month when the VOC emissions exceeded the 833 pounds per month limit, and the actual VOC emissions for each such month.

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

- (2) The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with the work practice standard in c)(1), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

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

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 833 lbs/month and 5.0 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (833 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.



2. P007, 110 TON PRESS

Operations, Property and/or Equipment Description:

Closed Molding Press

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the 833 lbs/month and 5.0 tons/yr. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.16	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limitations/control measures no longer apply.
- b. 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 VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

- (1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each mold compound (SMC/BMC) employed;
 - b. the weight of each mold compound (SMC/BMC) employed;
 - c. the percent of VOC monomer(s), by weight, of each mold compound (SMC/BMC) employed; and
 - d. the total VOC emission rate for all mold compound used, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i + \text{EF} \sum_j^k [(W2)]_j$$

where:

W = the weight of each polyester mold compound employed, as recorded in d)(1)b;

P = the percent of VOC monomer, by weight, of each mold compound (SMC/BMC) employed, as recorded in d)(1)c;



Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each mold compound (SMC/BMC) employed.

i = a specific polyester mold compound material (SMC/BMC) employed during the month;

n = total number of polyester mold compound materials (SMC/BMC) employed during the month;

W2 = the weight of each phenolic or epoxy mold compound employed, as recorded in d)(1)b;

j = a specific phenolic or epoxy mold compound material (SMC/BMC) employed during the month;

k = total number of phenolic or epoxy mold compound materials (SMC/BMC) employed during the month; and

EF = emissions factors:

(a) For polyester resins (excluding epoxy and phenolic mold compound):

EF = 30 lbs of VOC emissions emitted / tons of VOC monomer input

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

(0.015 lb VOC/lb monomer input) x 2000 lbs/ton = EF (30 lbs VOC /tons VOC monomer input)]

(b) For epoxy resin:

EF = 1.82 lb of VOC emissions emitted / ton of epoxy mold compound material (SMC/BMC)

1.82 lb of VOC/ ton of epoxy as determined from emissions testing for the production epoxy SMC, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc..

(c) For phenolic resin:

EF = 0.28 lb of VOC emissions emitted / tons of phenolic mold compound material (SMC/BMC)

0.28 lb of VOC / tons of phenolic mold compound as determined from emissions testing, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.



- (2) The permittee shall inspect each molding machine when in operation, and record the following information:
 - a. the date and reason why any required inspection was not performed;
 - b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each month when the VOC emissions exceeded the 833 pounds per month limit, and the actual VOC emissions for each such month.

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

- (2) The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with the work practice standard in c)(1), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

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

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 833 lbs/month and 5.0 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (833 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.



3. P009, 300 TON PRESS

Operations, Property and/or Equipment Description:

Closed Molding Press

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the 833 lbs/month and 5.0 tons/yr. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.16	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limitations/control measures no longer apply.
- b. 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 VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

- (1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each mold compound (SMC/BMC) employed;
 - b. the weight of each mold compound (SMC/BMC) employed;
 - c. the percent of VOC monomer(s), by weight, of each mold compound (SMC/BMC) employed; and
 - d. the total VOC emission rate for all mold compound used, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i + \text{EF} \sum_j^k [(W2)]_j$$

where:

W = the weight of each polyester mold compound employed, as recorded in d)(1)b;

P = the percent of VOC monomer, by weight, of each mold compound (SMC/BMC) employed, as recorded in d)(1)c;



Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each mold compound (SMC/BMC) employed.

i = a specific polyester mold compound material (SMC/BMC) employed during the month;

n = total number of polyester mold compound materials (SMC/BMC) employed during the month;

W2 = the weight of each phenolic or epoxy mold compound employed, as recorded in d)(1)b;

j = a specific phenolic or epoxy mold compound material (SMC/BMC) employed during the month;

k = total number of phenolic or epoxy mold compound materials (SMC/BMC) employed during the month; and

EF = emissions factors:

(a) For polyester resins (excluding epoxy and phenolic mold compound):

EF = 30 lbs of VOC emissions emitted / tons of VOC monomer input

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

(0.015 lb VOC/lb monomer input) x 2000 lbs/ton = EF (30 lbs VOC /tons VOC monomer input)]

(b) For epoxy resin:

EF = 1.82 lb of VOC emissions emitted / ton of epoxy mold compound material (SMC/BMC)

1.82 lb of VOC/ ton of epoxy as determined from emissions testing for the production epoxy SMC, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc..

(c) For phenolic resin:

EF = 0.28 lb of VOC emissions emitted / tons of phenolic mold compound material (SMC/BMC)

0.28 lb of VOC / tons of phenolic mold compound as determined from emissions testing, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.



- (2) The permittee shall inspect each molding machine when in operation, and record the following information:
 - a. the date and reason why any required inspection was not performed;
 - b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each month when the VOC emissions exceeded the 833 pounds per month limit, and the actual VOC emissions for each such month.

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

- (2) The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with the work practice standard in c)(1), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

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

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 833 lbs/month and 5.0 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (833 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.



4. P011, 700 TON PRESS

Operations, Property and/or Equipment Description:

Closed Molding Press

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the 1,166 lbs/month and 7.0 tons/yr. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.16	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limitations/control measures no longer apply.
- b. 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 VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

- (1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each mold compound (SMC/BMC) employed;
 - b. the weight of each mold compound (SMC/BMC) employed;
 - c. the percent of VOC monomer(s), by weight, of each mold compound (SMC/BMC) employed; and
 - d. the total VOC emission rate for all mold compound used, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i + \text{EF} \sum_j^k [(W2)]_j$$

where:

W = the weight of each polyester mold compound employed, as recorded in d)(1)b;

P = the percent of VOC monomer, by weight, of each mold compound (SMC/BMC) employed, as recorded in d)(1)c;



Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each mold compound (SMC/BMC) employed.

i = a specific polyester mold compound material (SMC/BMC) employed during the month;

n = total number of polyester mold compound materials (SMC/BMC) employed during the month;

W2 = the weight of each phenolic or epoxy mold compound employed, as recorded in d)(1)b;

j = a specific phenolic or epoxy mold compound material (SMC/BMC) employed during the month;

k = total number of phenolic or epoxy mold compound materials (SMC/BMC) employed during the month; and

EF = emissions factors:

(a) For polyester resins (excluding epoxy and phenolic mold compound):

EF = 30 lbs of VOC emissions emitted / tons of VOC monomer input

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

(0.015 lb VOC/lb monomer input) x 2000 lbs/ton = EF (30 lbs VOC /tons VOC monomer input)]

(b) For epoxy resin:

EF = 1.82 lb of VOC emissions emitted / ton of epoxy mold compound material (SMC/BMC)

1.82 lb of VOC/ ton of epoxy as determined from emissions testing for the production epoxy SMC, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc..

(c) For phenolic resin:

EF = 0.28 lb of VOC emissions emitted / tons of phenolic mold compound material (SMC/BMC)

0.28 lb of VOC / tons of phenolic mold compound as determined from emissions testing, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.



- (2) The permittee shall inspect each molding machine when in operation, and record the following information:
 - a. the date and reason why any required inspection was not performed;
 - b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each month when the VOC emissions exceeded the 1,166 pounds per month limit, and the actual VOC emissions for each such month.

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

- (2) The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with the work practice standard in c)(1), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

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

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 1,166 lbs/month and 7.0 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (1,166 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.