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

11/21/2013

Certified Mail

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

Vinod Shah
Continental Structural Plastics of Ohio LLC aka CSP OH
255 Rex Blvd.
Auburn Hills, MI 48326

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204020245
Permit Number: P0115595
Permit Type: Administrative Modification
County: Ashtabula

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice and the draft permit are enclosed. 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 draft permit or in narrative format. Any comments must be sent to the following:

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; Canada

Permit Strategy Write-Up

1. Check all that apply: Synthetic Minor Determination Netting Determination

2. Source (Project) Description: PTI P0115595 is for the administrative modification of P023 and P024 mold presses for fiberglass reinforced plastic parts. The permittee will employ an emissions factor of 0.002 lb. styrene emissions per lb. of sheet mold compound (SMC) input which will replace the current factor of 0.00134 lb. OC per lb. SMC input. The hourly, daily and annual OC emissions limits inPTI 02-12229, issued December 18, 2001, will be increased.

3. Facility Emissions and Attainment Status: This facility is a Title V source which is a major source for VOCs, a single HAP (styrene), and combined HAPs. This facility is a manufacturer of reinforced plastic composite products and is subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. It is located in Conneaut, Ashtabula County, which is in non-attainment for ozone.

4. Source (Project) Emissions: The factor of 0.002 lb. styrene/lb. SMC is from Engineering Environmental Consulting Services. (November 30, 2008). Test results: process emissions from SMC compression molding during SMC charge preparation and material handling at the Premix plant in North Kingsville, Ohio. See "2008 SMC Molding Emissions Test Results" attachment in application M0002428. The current emissions limits are compared to the proposed emissions limits.

OC EMISSIONS LIMITS							
	Current			Proposed			Net Change
EUId.	Lbs./Hr.	Lbs./Day	Tons/Yr.	Lbs./Hr.	Lbs./Day	Tons/Yr.	Tons/Yr.
P023	1.77	42.5	7.75	2.64	63.41	11.57	3.82
P024	2.72	65.2	11.9_	4.06	97.44	17.78	5.88
Total			19.65			29.35	9.70

Note A: Limit of 42.5 lbs. OC/day & 65.2 lbs. OC/day at P023 & P024, respectively, per former OAC rule 3745-21-07(G)(9)(g).
Note B: Limit of 63.41 lbs. OC/day & 97.44 lbs. OC/day at P023 & P024, respectively, per current OAC rule 3745- 21-07(M)(5)(e).

5. Conclusion: There are no changes in materials composition, production input or production procedures so that the change to a higher emissions factor is not a "Chapter 31" modification as defined in OAC rule 3745-31-01(QQQ) but is instead an administrative modification and it is not subject to a revision in the BAT requirements in OAC rule 3745-31-05(A)(3).

6. Please provide additional notes or comments as necessary: For approval of a BAT limit less stringent than the typical Ohio BAT of 40 lbs. VOC/day for P022, U.S. EPA required federally enforceable, practical restrictions per OAC rule 3745-21-07(G)(9)(g) in PTI 02-18224, which are included in term C.2.c):

   (1) The volatile organic compound (VOC) content of each mold compound employed at P022 shall be no more than 17% (by weight), as applied.
   (2) The use of cleanup solvents, containing OC materials, is prohibited.

   The rule has since been re-numbered in the revision as OAC rule 3745-21-07(M)(5)(e). Please also process administrative modification P0115596 for P022 and other units as the same time as this recommendation.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
OC	29.35

Ashtabula County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Continental Structural Plastics of Ohio LLC aka CSP OH

Issue Date: 11/21/2013
Permit Number: P0115595
Permit Type: Administrative Modification
Permit Description: Administrative modification to increase OC emissions limits due to reflect a change in emissions factor from 0.134% to 0.2% of available SMC input that is emitted as styrene/OC.
Facility ID: 0204020245
Facility Location: Continental Structural Plastics of Ohio LLC aka CSP OH
333 Gore Road,
Conneaut, OH 44030
Facility Description: All Other Plastics Product Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Christine McPhee, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Continental Structural Plastics of Ohio LLC aka CSP OH

Facility ID:	0204020245
Permit Number:	P0115595
Permit Type:	Administrative Modification
Issued:	11/21/2013
Effective:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install
for
Continental Structural Plastics of Ohio LLC aka CSP OH

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Authorization

Facility ID:	0204020245
Facility Description:	Reinforced plastic composite parts manufacturing and painting
Application Number(s):	M0002430
Permit Number:	P0115595
Permit Description:	Administrative modification to increase OC emissions limits due to reflect a change in emissions factor from 0.134% to 0.2% of available SMC input that is emitted as styrene/OC.
Permit Type:	Administrative Modification
Permit Fee:	$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	11/21/2013
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

Continental Structural Plastics of Ohio LLC aka CSP OH
333 Gore Road
Conneaut, OH 44030

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115595
Permit Description: Administrative modification to increase OC emissions limits due to reflect a change in emissions factor from 0.134% to 0.2% of available SMC input that is emitted as styrene/OC.

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

Group Name: Mold press group 2

Emissions Unit ID:	**P023**
Company Equipment ID:	Press 19
Superseded Permit Number:	02-12229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P024**
Company Equipment ID:	Press 20
Superseded Permit Number:	02-12229
General Permit Category andType:	Not Applicable

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) 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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 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, andreportingrequirements contained in this permit shall be submitted 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 theOhio EPA DAPC, Northeast District Officein 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

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 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.

c) 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 theOhio 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 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)not exempt from the requirement to obtain a Permit-to-Install.

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 permittee 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 “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director 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.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

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 operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon 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 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.

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. 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.

3. The following emissions units, as well as cleaning of equipment used in reinforced plastic composites manufacture, volatile organic compound-containing (VOC-containing) materials storage, and repair operations on reinforced plastic composites parts that are manufactured at the facility contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. 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 Ohio EPA Northeast District Office.

EU ID	Operations, Property and/or Equipment Description
P001	24 inch sheet mold compound (SMC) machine no. 1.
P010	Compression mold press no. 6 for reinforced plastic composite parts.
P011	Compression mold press no. 7 for reinforced plastic composite parts.
P012	Compression mold press no. 8 for reinforced plastic composite parts.
P017	Injection mold press no. 13 with a slitter for reinforced plastic composite parts.
P018	Injection mold press no. 14 with a slitter system for reinforced plastic composite parts.
P020	Compression mold press no. 16 for reinforced plastic composite parts.
P021	Compression mold press no. 17 for reinforced plastic composite parts.
P022	Compression mold press no. 18 for reinforced plastic composite parts.
P023	Compression molding press no. 19 for fiberglass reinforced plastic parts.
P024	Compression molding press no. 20 for fiberglass reinforced plastic parts.
P025	Jayco mixer 2 for polyester resin/styrene paste production with a baghouse (JAYCODC) to control particulate emissions
P026	Injection mold press no. 21 with a slitter system for reinforced plastic composite parts.
P027	48 inch sheet mold compound (SMC) machine no. 2.
P028	Cowles mixer 1 for polyester resin/styrene paste production with a baghouse to control particulate emissions.
P030	Compression mold press no. 22 for reinforced plastic composite parts.
P031	Compression mold press no. 23 for reinforced plastic composite parts.
P032	Compression mold press no. 24 for reinforced plastic composite parts.
P033	Compression mold press no. 25 for reinforced plastic composite parts.
P034	Compression mold press no. 26 with a slitter system for reinforced plastic composite parts.
P035	370 gal "B" tank & inline mixer for 24" SMC machine.
P036	800 gal "A" tank, 370 gal "B" tank, 55 gal "C" tank and inline mixer serving 48" SMC machine.
P043	Lab mold press for fiberglass reinforced composite plastic parts.
T002	6000 gallon tank no. 2 for storage of polyester resin/styrene mixture.
T003	6000 gallon tank no. 3 for storage of polyester resin/styrene mixture.
T004	6000 gallon tank no. 4 for storage of polyester resin/styrene mixture.
T009	6000 gallon tank no. 1 for storage of polyester resin/styrene mixture.

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 63.5780 – 63.5935 and Table 15 of 40 CFR Part 63, Subpart WWWW]

4. Requirements of OAC rule 3745-21-25:

a) VOC control requirements:

(1) The permittee shall meet the work practice standards in Table 1 of OAC rule 3745-21-25.

(2) Currently, the facility has VOC emissions less than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall meet the VOC emissions limits in Table 2 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.4.e).

(3) If the facility has VOC emissions equal to or greater than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. Therefore, the permittee shall reduce the total VOC emissions from these operations by at least ninety-five percent (95%) by weight. As an alternative to meeting 95% by weight reduction, the permittee may meet the VOC emissions limits in Table 3 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.4.e).

(4) Once the facility equals or exceeds the one hundred (100) tons of VOC per year threshold of OAC rule 3745-21-25(D)(3), it is always subject to the requirements of the OAC rule 3745-21-25(D)(3).

[Authority for term: OAC rule 3745-21-25(D)]

b) Recordkeeping Requirements:

(1) In accordance with OAC rule 3745-21-25(P)(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 documentation supporting any applicability or compliance status; and

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

[Authority for term: OAC rule 3745-21-25(P)(1)]

(2) In accordance with OAC rule 3745-21-25(P)(4), all records specified in section B.4.b)(1) shall be retained by the owner or operator for a period of not less than five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4)]

c) Reporting Requirements:

(1) In accordance with OAC rule 3745-21-25(Q)(1) and (Q)(3), the permittee shall submit semiannual compliance status reports containing the following information:

a. Company name and address;

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. Date of the report and beginning and ending dates of the reporting period;

d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in Table 1 of the OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;

e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs at an affected operation where a continuous monitoring system (CMS) is not used to comply with the VOC emissions limitation, operating, or work practice standard in OAC rule 3745-21-25, the compliance report shall contain the information in the following:

i. The total operating time of each following operation during the reporting period:

(a) Open molding;

(b) Compression/injection molding;

(c) Centrifugal casting;

(d) Continuous lamination;

(e) Continuous casting;

(f) Polymer casting;

(g) Pultrusion;

(h) SMC manufacturing;

(i) BMC manufacturing;

(j) Mixing;

(k) Cleaning of equipment used in reinforced plastic composites manufacture;

(l) VOC-containing materials storage; and

(m) Repair operations on reinforced plastic composites parts that are manufactured at the facility.

ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action(s) taken; and

f. Where multiple compliance options are available, the permittee shall state in this compliance report if the permittee has changed compliance options since the last compliance report.

[Authority for term: OAC rule 3745-21-25(Q)(1) and OAC rule 3745-21-25(Q)(3)]

(2) The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each 6-month period to the Ohio EPA Northeast District Office. The first compliance report shall cover the period beginning on the compliance date that is specified in section B.4.d) and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date in section B.4.d). Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

[Authority for term: OAC rule 3745-21-25(Q)(1)]

(3) For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the permittee may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

[Authority for term: OAC rule 3745-21-25(Q)(2)]

(4) In accordance with OAC rule 3745-21-25(Q)(4), the permittee shall report if the facility exceeded the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to OAC rule 3745-21-25(D)(3).

[Authority for term: OAC rule 3745-21-25(Q)(4)]

(5) In accordance with OAC rule 3745-21-25(S)(1), the permittee of an affected operation, as described in section B.4.c)(1), shall notify the appropriate Ohio EPA Northeast District Office in writing that such operation is subject the OAC rule 3745-21-25. The notification,

which shall be submitted no later than sixty days after December 14, 2009, shall provide the following information:

a. name and address of the owner or operator;

b. address (i.e., physical location) of the facility;

c. equipment description and Ohio EPA application number (if assigned) of the affected operation;

d. identification of the applicable requirements, the means of compliance, and the compliance date for the affected operation under OAC rule 3745-21-25; and

e. regarding a permit for the affected operation, whichever of the following is applicable:

i. submission of an application for an operating permit, a permit modification, or an operating permit renewal in accordance with OAC rule 3745-31-02; or

ii. submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit accordance with OAC rule 3745-77-02 or 3745-77-06, respectively.

[Note: the initial notification of applicability with OAC rule 3745-21-25 was received on October 27, 2010.]

[Authority for term: OAC rule 3745-21-25(S)(1)]

d) The compliance date for OAC rule 3745-21-25 requirements for this "existing facility" is December 14, 2009.

[Authority for term: OAC rule 3745-21-25(R)(1)]

e) Calculation of facility's VOC emissions threshold

(1) In accordance with OAC rule 3745-21-25(F)(1), to calculate the facility's VOC emissions threshold in tons per year for purposes of determining which requirements apply under OAC rule 3745-21-25 (D), the permittee shall use the procedures in section B.4.e)(2). A facility's VOC emissions threshold pertains to the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. For the facility's VOC emissions threshold, calculate VOC emissions prior to any add-on control device, and do not include VOC emissions from any resin or gel coat used in operations subject to the boat manufacturing NESHAP, 40 CFR Part 63, Subpart VVVV, or from the manufacture of large parts as defined in OAC rule 3745-21-25(D)(4).

[Authority for term: OAC rule 3745-21-25(F)(1)]

(2) In accordance with OAC rule 3745-21-25(F)(3), the permittee may use the procedures in either section B.4.e)(2)a or section B.4.e)(2)b for the operations specified in section B.4.e)(1). If the emission factors for this facility have changed over the period of time prior to its initial compliance date due to incorporation of pollution-prevention control techniques, the facility may base the average emission factor on its operations as they exist on the compliance date. If the facility has accepted an enforceable permit limit that would result in less than one hundred tons per year (per rolling, 12-month period) of VOC measured prior to any add-on controls, and can demonstrate that it will operate at that level subsequent to the compliance date, it can be deemed to be below the one hundred tons per year threshold.

a. Use a calculated emission factor

Calculate a weighted average VOC emissions factor on a pounds per ton of resin, monomer, or gel coat basis. Base the weighted average on the prior twelve months of operation. Multiply the weighted average VOC emissions factor by resin, monomer or gel coat use over the same period. The permittee may calculate this VOC emissions factor based on the equations in Table 1 to Subpart WWWW of 40 CFR Part 63, or the permittee may use any VOC emission factor approved by USEPA, such as emission factors or emission factor equations from AP-42, or site-specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emission factors in Table 1 to Subpart WWWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this rule.

b. Conduct performance testing

Conduct performance testing using the test procedures in 40 CFR 63.5850 or paragraph (C) of rule 3745-21-10 of the Administrative Code to determine a site-specific VOC emissions factor in units of pounds of VOC per ton of resin, monomer, or gel coat used. Conduct the test under conditions expected to result in the highest possible VOC emissions. Multiply this factor by annual resin, monomer, or gel coat use to determine annual VOC emissions. This calculation shall be repeated and reported annually.

[Authority for term: OAC rule 3745-21-25(F)(3)]

(3) In accordance with OAC rule 3745-21-25(F)(4), the facility shall initially perform this calculation based on its 12-month of operation prior to December 14, 2009, and include this information with its applicability notification report. The facility shall repeat the calculation based upon its resin, monomer, and gel coat use in the 12 months prior to its compliance date, and submit this information with their initial compliance report.

[Authority for term: OAC rule 3745-21-25 (F)(4)]

(4) In accordance with OAC rule 3745-21-25(F)(5), after the initial compliance date, the facility shall calculate VOC emissions over the 12-month period ending June thirtieth or December thirty-first, whichever date is the first date following the compliance date specified in section B.4.d). Subsequent calculations should cover the periods in the semiannual compliance reports.

[Authority for term: OAC rule 3745-21-25(F)(5)]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Mold press group 2: P023,P024,

EU ID	Operations, Property and/or Equipment Description
P023	compression molding press #19 for fiberglass reinforced plastic parts
P024	compression molding press #20 for fiberglass reinforced plastic parts

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 P0115595 for the administrative modification of PTI 02-12229, issued December 18, 2001 for emissions units P023 and P024.	See b)(2)a.
b.	OAC rule 3745-21-07(M)	See b)(2)b.
c.	OAC rule 3745-21-07(M)(5)(e)	The OC emissions from production operations shall not exceed 63.41 lbs/day from emissions unit P023 and 97.44 lbs/day from emissions unit P024. See c)(1) and c)(2).
d.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(3).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(3).
f.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. Organic compound (OC) emissions shall not exceed the following:

EU ID	Equipment Description	Lbs. /hr.	Lbs./day	tons/yr.
P023	Mold press no. 19 for fiberglass reinforced plastic parts	2.64	Not applicable	11.57
P024	Mold press no. 20 for fiberglass reinforced plastic parts	4.06	Not applicable	17.78

[Authority for term: PTI P0115595 and OAC rule 3745-31-05(A)(3)]

b. Emissions units P023 and P024 are not equipped with control equipment for OC emissions. In accordance with OAC rule 3745-21-07(M)(3), these emissions units are not subject to the requirements of OAC rule 3745-21-07(M)(2).

[Authority for term: OAC rule 3745-21-07(M)]

c) Operational Restrictions

(1) The volatile organic compound (VOC) content of each mold compound employed at emissions unit P022 shall be no more than 17% (by weight), as applied.

(2) The use of cleanup solvents containing OC materials is prohibited. See g)(1).

(3) Work practices for closed molding machines: The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers shall be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials shall be recovered after slitting.

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b) and Table 4 of 40 CFR Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following daily records for each emissions unit:

a. the identification of each mold compound employed in the emissions unit;

b. the weight, in pounds, of each mold compound employed in the emissions unit;

c. the total OC emissions rate for all mold compounds, in pounds per day, calculated as specified:

$E_P = (EF)\sum_{i=1}^{n}[(WT)]i$

where:

WT = the weight of each mold compound employed, as recorded in d)(2)b;

EF =an emissions factor for styrene emissions which is 0.002 lb. styrene emissions per lb. of sheet mold compound input from Engineering Environmental Consulting Services. (November 30, 2008). Test results: process emissions from SMC compression molding during SMC charge preparation and material handling at the Premix plant in North Kingsville, Ohio. Equivalent, alternative method(s), as approved by Ohio EPA may be employed;

i = a specific mold compound employed during the day; and

n = total number of mold compounds employed during the day;

d. the VOC content of each mold compound employed, in percent by weight;

e. the actual number of hours that the emissions unit was in operation;

f. the average hourly OC emissions rate for all mold compounds, i.e., (c) divided by (e), in pounds per hour (average).

[Authority for term: PTI P0115595]

(2) The permittee shall conduct daily inspections of each emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:

a. whether the emissions unit was in operation;

b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and

c. information on the duration and cause of each deviation and the corrective action(s) taken.

[Authority for term: PTI P0115595]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for each emissions unit:

a. an identification of each day during which the average hourly OC emissions from the employment of mold compound(s) exceeded the hourly limit in b)(2)a, and the actual hourly OC emissions for each such day; and

b. an identification of each day during which the daily OC emissions from the employment of mold compound(s) exceeded the daily limit in b)(1)c, and the actual daily OC emissions for each such day;

c. an identification of each day during which mold compound(s) with a VOC content of greater than 17% (by weight), as applied was employed, and the actual VOC content, weight of mold compound(s) and actual daily VOC emissions for each such day; and

d. an identification of each day during which any cleanup/purge materials with an OC content were employed.

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 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine); and

b. if there were deviations from the work practice standards in c)(1), 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.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-21-25(Q)(5)]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5905, 63.5910 and Table 14.

[Authority for term: 40 CFR 63.5905 and 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW]

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. The OC emissions from the employment of mold compounds shall not exceed the following:

EU ID	Equipment Description	Lbs./hr.	Lbs./day	tons/yr.
P023	Mold press no. 19 for fiberglass reinforced plastic parts	2.64	63.41	11.57
P024	Mold press no. 20 for fiberglass reinforced plastic parts	4.06	97.44	17.78

Applicable Compliance Method(s):

i. Compliance with the hourly emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(1)f.

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 21, 24 or 25 or equivalent, alternative method(s), as approved by Ohio EPA.

ii. Compliance with the daily emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(1)c.

iii. Compliance with the annual emission limitations may be demonstrated based upon the following equation(s):

OC(YR) = { $\sum_{i=1}^{n}[E_P]i$ } x ton OC/2000 lbs. OC.

where:

E_P = the OC emissions from all mold compounds, in pounds per day, as recorded in d)(1)c.;

i = subscript denoting individual daily emissions from mold compounds; and

n = the total number of days of mold compound employment.

[Authority for term: PTI P0115595]

g) Miscellaneous Requirements

(1) The permit application notes that only mold compounds are employed at emissions units P023 and P024. No use of cleanup materials is indicated in the permit application.

(2) This administrative permit modification, PTI P0115595, for emissions units P023 and P024 to increase the allowable limits for OC emissions due to the use of a revised factor to estimate OC emissions, shall supercede the requirements of PTI 02-12229.