

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

12/23/2013

Certified Mail

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| Yes | 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 |

Andrew Cole
Core Molding Technologies
800 Manor Park Drive
Columbus, OH 43228

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0125041046
Permit Number: P0115955
Permit Type: Initial Installation
County: Franklin

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 Columbus Dispatch. 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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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, Central District Office at (614)728-3778.

Sincerely,


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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-CDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Core Molding Technologies (Core) has submitted a PTI application for two new thermosetting presses (emissions units P060 and P061). Each thermosetting press is fitted with molds that cure sheet molding compound (SMC) and in-mold compound (IMC) into a desired shape using pressure and heat.

3. Facility Emissions and Attainment Status:

Core is a fiberglass reinforced plastic parts (i.e., truck bodies) production facility located in Franklin County. The facility is a Title V source for VOC and HAP emissions from an SMC production machine and maturation room, thermosetting presses, coating booths and ovens. Franklin County is currently in marginal nonattainment for the 2008 eight-hour ozone standard.

The thermosetting presses are operating under a combined federally enforceable limitation of 98 tons of VOC per rolling, 365-day period. Core is requesting to include P060 and P061 under the group limit to avoid NSR.

4. Source Emissions:

P060 and P061 are the source of VOC and HAP emissions from the use of SMC and IMC. P060 and P061 are also the source of VOC emissions from the use of cleanup materials.

Potential emissions from each thermosetting press were calculated as 20.8 tons of VOC per year and 10.2 tons of HAP per year as follows.

VOC/HAP Emissions from Press Operations

Hourly VOC/HAP emissions = (material usage) x (VOC/HAP wt%) x (emissions factor), where:

SMC usage = 900 lb/hr per press

VOC/HAP content of SMC = 11.5%

IMC usage = 36 lb/hr per press

VOC/HAP content of IMC = 35%

Emissions factor = 2% (derived from AP-42, Section 4.4, Table 4.4-2 for closed molding)

Hourly VOC/HAP emissions = $[(900 \text{ lb/hr}) \times (0.115) + (36 \text{ lb/hr}) \times (0.35)] \times (0.02) = 2.32 \text{ lb/hr}$

Annual VOC/HAP emissions = $(2.32 \text{ lb/hr}) \times (8,760 \text{ hr/yr}) / (2,000 \text{ lb/ton}) = 10.2 \text{ ton/yr}$



VOC Emissions from Cleanup Materials

Monthly VOC emissions = (material usage) x (VOC content), where:

Diacetone alcohol (DAA) usage = 200 gal/month per press

VOC content of DAA = 7.84 lb/gal

Isopropyl alcohol (IPA) usage = 30 gal/month per press

VOC content of IPA = 6.55 lb/gal

Monthly VOC emissions = [(200 gal/month) x (7.84 lb/gal) + (30 gal/month) x (6.55 lb/gal)] / (2,000 lb/ton) = 0.88 ton/month

Annual VOC emissions = (0.88 ton/month) x (12 month/yr) = 10.6 ton/yr

In accordance with Ohio EPA's August 30, 2013, Best Available Technology (BAT) guidance, BAT for VOC has been established as work practice standards for compression/injection molding and the cleaning operation.

5. Conclusion:

Issuance of P0115955 is recommended.

Franklin County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Core Molding Technologies

Issue Date: 12/23/2013
Permit Number: P0115955
Permit Type: Initial Installation
Permit Description: Installation permit for two thermosetting presses.
Facility ID: 0125041046
Facility Location: Core Molding Technologies
800 Manor Park,
Columbus, OH 43228-0183
Facility Description: Automobile 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: Pamela McCoy, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Core Molding Technologies

| | |
|----------------|-----------------------------------|
| Facility ID: | 0125041046 |
| Permit Number: | P0115955 |
| Permit Type: | Initial Installation |
| Issued: | 12/23/2013 |
| Effective: | To be entered upon final issuance |



Division of Air Pollution Control
Permit-to-Install
for
Core Molding Technologies

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Draft Permit-to-Install
Core Molding Technologies
Permit Number: P0115955
Facility ID: 0125041046

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125041046
Facility Description: Plastics products nec
Application Number(s): A0049553
Permit Number: P0115955
Permit Description: Installation permit for two thermosetting presses.
Permit Type: Initial Installation
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/23/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Core Molding Technologies
800 Manor Park
Columbus, OH 43228-0183

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0115955

Permit Description: Installation permit for two thermosetting presses.

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

Group Name: Thermoset Presses

| | |
|-----------------------------------|------------------------------|
| Emissions Unit ID: | P060 |
| Company Equipment ID: | SMC Thermosetting Press #217 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P061 |
| Company Equipment ID: | SMC Thermosetting Press #219 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Draft Permit-to-Install
Core Molding Technologies
Permit Number: P0115955
Facility ID: 0125041046
Effective Date: To be entered upon final issuance

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, Central 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, Central 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, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Central 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, Central 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) 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, Central 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, Central 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, Central 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 obtained before 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 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 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.



Draft Permit-to-Install
Core Molding Technologies
Permit Number: P0115955
Facility ID: 0125041046
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Core Molding Technologies
Permit Number: P0115955
Facility ID: 0125041046

Effective Date: To be entered upon final issuance

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. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW: P060 and P061. 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 Ohio EPA, Central District Office.



Draft Permit-to-Install
Core Molding Technologies
Permit Number: P0115955
Facility ID: 0125041046
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Thermoset Presses: P060 and P061

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| P060 | Sheet Molding Compound is molded by compression press into fiberglass reinforced plastic parts |
| P061 | Sheet Molding Compound is molded by compression press into 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 3745-21-25 | See b)(2)b. below. |
| b. | ORC 3704.03(T) | See b)(2)b. below. |
| c. | OAC rule 3745-31-05(D) (Federally Enforceable Limitation To Avoid NSR) | See b)(2)a. below. |
| d. | 40 CFR Part 63, Subpart WWWW | See b)(2)c. below. |
| e. | 40 CFR Part 63, Subpart A (40 CFR Part 63.1-16) | See b)(2)d. below. |

(2) Additional Terms and Conditions

a. The aggregate volatile organic compound (VOC) emissions from emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061 shall not exceed 98 tons per year, based upon a rolling, 365-day summation of the daily emissions.

b. The following work practice standards from Table 1 of OAC rule 3745-21-25 apply to this emissions unit:



Effective Date: To be entered upon final issuance

| Type of operation | Work practice standards |
|--|---|
| Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture) | Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. |
| Compression/injection molding | 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. |

- c. The work practice standards that apply to this emissions unit are identified in Table 4 to Subpart WWWW of 40 CFR Part 63 - "Work Practice Standards".
- d. Table 15 to Subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW.
- (2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. The total number of pounds of mold release (MR) employed in emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061.



- b. For emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061, the total number of emissions units which were operated during the month.
 - c. The average number of pounds of MR employed per emissions unit (i.e., (a) divided by (b)).
 - d. The average number of pounds of MR employed per emissions unit per day (i.e., (c) divided by the number of days in that specific month).
- (2) The permittee shall maintain daily records of the following information for this emissions unit:
- a. The company identification for the material(s) employed (i.e., sheet molding compound (SMC), in-mold compound (IMC), and MR).
 - b. The number of pounds of SMC, IMC, and MR*, as employed.
*From section d)(1) above.
 - c. The VOC content of each material, in pound of VOC per pound of material.
 - d. The VOC emissions from SMC, IMC, and MR**, in pounds of VOCs per day.
**Multiply the average daily MR usage (from section d)(1)d. above) by the VOC content of MR to determine the VOC emission rate for MR.
 - e. The total VOC emissions from SMC, IMC, and MR, in pounds of VOCs per day (i.e., the summation of the pounds per day VOC emission rates for SMC, IMC and MR).
- (3) VOC emissions from cleanup material usage associated with P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 365-day VOC emission limitation under b)(2)a.
- The permittee may maintain the records and calculations of emissions from cleanup materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.
- (4) The permittee shall maintain monthly records of the following information for the combined cleanup material employed in emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061:
- a. the name and identification of each cleanup material used to flush the presses;
 - b. the name and identification of each cleanup material used to wipe down molded parts;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;



- e. the total VOC emissions from all cleanup material employed, prior to any credit for recovered materials, in pounds or tons per month; and
 - f. the average daily VOC emissions from all cleanup material employed, prior to any credit for recovered materials, in pounds or tons per day (i.e., (e) divided by the number of days in that specific month).
- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records:
- a. the date the recovered cleanup materials were shipped off site;
 - b. the number of gallons of recovered cleanup materials shipped off site;
 - c. the VOC content of the recovered cleanup materials, in pounds per gallon; and
 - d. the total VOC emissions (in pounds or tons) from recovered cleanup materials to be credited against the total VOC emissions from all cleanup employed in emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061.
- (6) In order to document the rolling, 365-day VOC emissions from P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061, the permittee shall maintain daily records of the following information:
- a. the total VOC emissions from all SMC, IMC, and MR employed in emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061, in tons per day;
 - b. the total VOC emissions from all cleanup material employed in P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061 (from section d)(4)f. above), in tons per day;
 - c. if a credit for recovered cleanup material is used, the total VOC emissions from recovered cleanup materials, in tons per day;
 - d. the total net VOC emissions from all cleanup material employed in emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061, in tons per day, i.e., (b) – (c);
 - e. the total VOC emissions from P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061, i.e., (a) + (d); and
 - f. the rolling, 365-day total VOC emissions from P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061, i.e., (e) + the previous 364-day calculated VOC emissions from P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061.



- (7) The permittee shall maintain the records necessary to demonstrate compliance with the applicable work practice standards for OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(P).
- (8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW.
- (9) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the rolling, 365-day total VOC emissions for emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061 exceeded 98 tons and the actual rolling, 365-day value for each such day. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) The permittee shall submit semi-annual compliance status reports in accordance with OAC rule 3745-21-25(Q).
- (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW.
- (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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. Emissions Limitation

The aggregate volatile organic compound (VOC) emissions from emissions units P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P043, P044, P060 and P061 shall not exceed 98 tons per year, based upon a rolling, 365-day summation of the daily emissions.

Applicable Compliance Method

Compliance with the annual limit shall be determined by the daily rolling, 365-day summation established in section d)(6).



- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW.
 - (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- g) Miscellaneous Requirements
- (1) None.