

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

6/12/2014

Genevieve Damico *Via E-Mail Notification*  
United States Environmental Protection Agency  
Mail Code: AR-18J  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT  
Facility Name: PlastproInc-Ashtabula Plant  
Facility ID: 0204000441  
Permit Type: Renewal  
Permit Number: P0109355

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northeast District Office





**PROPOSED**

**Division of Air Pollution Control  
Title V Permit  
for  
Plastpro Inc-Ashtabula Plant**

Facility ID:	0204000441
Permit Number:	P0109355
Permit Type:	Renewal
Issued:	6/12/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Plastpro Inc-Ashtabula Plant

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	2
1. Federally Enforceable Standard Terms and Conditions .....	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans .....	7
5. Title IV Provisions .....	7
6. Severability Clause .....	7
7. General Requirements .....	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios .....	9
11. Reopening for Cause .....	9
12. Federal and State Enforceability .....	9
13. Compliance Requirements .....	9
14. Permit Shield .....	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes .....	12
18. Compliance Method Requirements .....	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance .....	13
22. Permanent Shutdown of an Emissions Unit .....	13
23. Title VI Provisions .....	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only .....	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests .....	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers .....	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	15
30. Submitting Documents Required by this Permit .....	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions .....	30
1. R001, paint booth no. 1.....	31
2. R004, Paint booth no. 2 .....	36
3. Emissions Unit Group -Mold Presses: P001,P002,P003,P004,P005,P006,P007,P008, .....	41



**Proposed Title V Permit**  
Plastpro Inc-Ashtabula Plant  
**Permit Number:** P0109355  
**Facility ID:** 0204000441

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0204000441  
Facility Description: Manufacture of Fiberglass Reinforced Plastics  
Application Number(s): A0043583, A0046870  
Permit Number: P0109355  
Permit Description: Renewal Title V operating permit for a Fiberglass Reinforced Plastics Manufacturing facility.  
Permit Type: Renewal  
Issue Date: 6/12/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0084044

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

PlastproInc-Ashtabula Plant  
4737 Kister Court. Ashtabula Ohio 44004  
Saybrook Twp., OH 44004

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Proposed Title V Permit**  
Plastpro Inc-Ashtabula Plant  
**Permit Number:** P0109355  
**Facility ID:** 0204000441  
**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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## 2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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



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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

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

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

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

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



#### **4. Risk Management Plans**

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

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

#### **5. Title IV Provisions**

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

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

#### **6. Severability Clause**

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

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

#### **7. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
  
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

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

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

## **8. Fees**

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

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

## **9. Marketable Permit Programs**

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

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



## **10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

## **11. Reopening for Cause**

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

## **12. Federal and State Enforceability**

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

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

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
    - b. The permittee's current compliance status.



- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

#### **15. Operational Flexibility**

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

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



## **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

## **17. Off-Permit Changes**

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

## **18. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

**20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

**22. Permanent Shutdown of an Emissions Unit**

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

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

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

**23. Title VI Provisions**

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



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

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

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

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



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

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

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

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

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



**Proposed Title V Permit**

Plastpro Inc-Ashtabula Plant

**Permit Number:** P0109355

**Facility ID:** 0204000441

**Effective Date:** To be entered upon final issuance

### **30. Submitting Documents Required by this Permit**

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 Ohio EPA DAPC, Northeast District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Proposed Title V Permit**  
Plastpro Inc-Ashtabula Plant  
**Permit Number:** P0109355  
**Facility ID:** 0204000441  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



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. There are no insignificant emissions units at this facility with applicable requirements.
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	Compression mold press no. 1 of thermoset, fiberglass reinforced composite plastic parts.
P002	Compression mold press no. 2 of thermoset, fiberglass reinforced composite plastic parts.
P003	Compression mold press no. 3 of thermoset, fiberglass reinforced composite plastic parts.
P004	Compression mold press no. 4 of thermoset, fiberglass reinforced composite plastic parts.
P005	Compression mold press no. 5 of thermoset, fiberglass reinforced composite plastic parts.
P006	Compression mold press no. 6 of thermoset, fiberglass reinforced composite plastic parts.
P007	Compression mold press no. 7 of thermoset, fiberglass reinforced composite plastic parts.
P008	Compression mold press no. 8 of thermoset, fiberglass reinforced composite plastic parts.

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 and PTI P0112958]

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, 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), OAC rule 3745-77-07(C)(1) and PTI P0112958]

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) and PTI P0112958]

- (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) and PTI P0112958]

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.



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), OAC rule 3745-77-07(C)(1) and PTI P0112958]

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) and PTI P0112958]

- (2) 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) and PTI P0112958]

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



**Proposed Title V Permit**

Plastpro Inc-Ashtabula Plant

**Permit Number:** P0109355

**Facility ID:** 0204000441

**Effective Date:** To be entered upon final issuance

- 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) and PTI P0112958]

- 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) and PTI P0112958]

- 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) and PTI P0112958]

- (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) and PTI P0112958]

- (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) and PTI P0112958]

- (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) and PTI P0112958]

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP: R001 and R004.

a) Applicable Emissions Limitation and/or Control Requirements for R001 and R004

- (1) In accordance with 40 CFR 63.4490(a)(1), the organic Hazardous Air Pollutant (HAP) emissions shall not exceed 0.16 lb/lb of coating solids used during each rolling, 12-month period for a general use coating operation.

b) Additional Terms and Conditions for R001 and R004

- (1) The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.
- (2) The permittee, using the "compliant material" option, shall not apply any coating in the coating(s) operations with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives and



cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emissions rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

- (3) The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:
  - (a) all coating operations as defined in 40 CFR 63.4581;
  - (b) all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (c) all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
  - (d) all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

c) Operational Restrictions for R001 and R004

- (1) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.4492 or work practice standards in 40 CFR 63.4493.

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

- (2) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.



Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (Ohio EPA Division of Air Pollution Control Northeast District Office), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart PPPP and PTI P0116431]

d) Monitoring and/or Record Keeping Requirements for R001 and R004 – 40 CFR 63.1 – 63.15 (40 CFR Part 63, Subpart A) Table 2 to Subpart PPPP of 40 CFR 63 – Applicability of General Provisions to Subpart PPPP of Part 63.

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including at a minimum:

(i) information from the supplier or manufacturer,

(ii) formulation data and/or coating/material testing data,

(iii) all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic parts coating operations contained no organic HAP\*;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;

iii. Information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material, pounds/gallon of material, or calculated in kg/liter); or



- iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart PPPP or Table 4 if not listed in Table 3, can be used.
- e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied, determined using one of the following methods:
  - i. Method 24 from 40 CFR Part 60, Appendix A; or
  - ii. Information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);

- f. the organic HAP content of each coating, in pound of organic HAP emitted per pound of coating solids used or kg of organic HAP emitted per kg of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the "compliant material" option:

$$H_c = W_c / S_c$$

where:

$H_c$  is the organic HAP content of coating "c", in kg organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used.

$W_c$  is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in (d) above.

$S_c$  is the mass fraction of coating solids in coating "c", kg coating solids per kg coating or pound of coating solids per pound of coating, as determined in (e) above; and

- g. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content ( $H_c$ ) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.



\* No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

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

- (2) The permittee shall also maintain the following records for the plastic parts coating line:
- a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.4490 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
  - b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the records of the data and calculations used to determine the predominant activity;
  - c. if using the “facility-specific” emission limit under 40 CFR 63.4490(c)(2), the data used to calculate the “facility-specific” emission limit; and
  - d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity determination or calculation of the “facility-specific” emission limit must comply with the applicable limit and requirements for the “compliant material” option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

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

- (3) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.

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



e) Reporting Requirements for R001 and R004

- (1) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:
  - a. company name and address;
  - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
  - c. the date of the report and beginning and ending dates of the reporting period;
  - d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;
  - e. statement of whether the affected source achieved the emission limitations for the compliance period;
  - f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.4490 for each type of compliant coating applied;
  - g. if using the predominant activity alternative according to 40 CFR 63.4490(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;
  - h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;
  - i. if there were no deviations from the emission limitations in 63.4490, a statement that there were no deviations from the emissions limitations during the reporting period; and
  - j. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information:
    - i. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;
    - ii. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;



- iii. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and
- iv. a statement of the cause of each deviation.

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

- (2) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

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

- f) Testing Requirements for R001 and R004, Table 2 to Subpart PPPP of 40 CFR 63 – Applicability of General Provisions to Subpart PPPP of Part 63.

- (1) Compliance with the Emission Limitations and/or Control Requirements specified in Section 5.a) shall be determined in accordance with the following methods:

- a. Emission Limitations:

The organic HAP emissions shall not exceed 0.16 lb/lb of coating solids used during each rolling, 12-month period for a general use coating operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

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

- g) Miscellaneous Requirements for R001 and R004

- (1) According to 40 CFR 63.4492(a), for any coating operation(s) on which the compliant material option or the emission rate without add-on controls option is used, the permittee is not required to meet the operating limits in 40 CFR 63.4492(b) or (c).
- (2) According to 40 CFR 63.4493(a), for any coating operation(s) on which the compliant material option or the emission rate without add-on controls option is used, the permittee is not required to meet the work practice standards in 40 CFR 63.4493(b) or (c).



**Proposed Title V Permit**  
Plastpro Inc-Ashtabula Plant  
**Permit Number:** P0109355  
**Facility ID:** 0204000441  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



1. R001, paint booth no. 1

Operations, Property and/or Equipment Description:

Paint spray booth no. 1 with 2 work stations for prime and finish of fiberglass reinforced plastic door components. Coatings are air dried.

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) d)(8)

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 02-21701 issued May 25, 2006]	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.86 lbs/hr and 8.15 tpy.  See b)(2)a.
b.	40 CFR Part 63, Subpart PPPP 40 CFR 63.4480 - 63.4581	See B.5.
c.	OAC rule 3745-21-07(M)	See b)(2)b.
d.	OAC rule 3745-17-11(C)	See c)(1).

(2) Additional Terms and Conditions

a. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation to control the particulate emissions generated from operating this emissions unit.

b. This emissions unit is not equipped with control equipment for organic compound emissions. In accordance with OAC rule 3745-21-07(M)(3), this emissions unit is not subject to the requirements of OAC rule 3745-21-07(M)(2).

c) Operational Restrictions

(1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee.



- a. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
- b. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

d) Monitoring and/or Recordkeeping Requirements

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

- a. the name and identification number of each coating;
- b. the volume of each employed, defined as "V", in gallons;
- c. the VOC content (excluding water and exempt solvent) of each coating, as applied, defined as "C<sub>VOC</sub>", in pounds per gallon;
- d. the total operating hours of this emissions unit, defined as "OT", in hours per day;
- e. the total VOC emissions from this emissions unit for the day, defined as "D<sub>VOC</sub>", in pounds per day:

D<sub>VOC</sub> shall be calculated as follows:

$$D_{VOC} = \text{the sum, from } i = 1 \text{ to } i = n \text{ of } \{V \times C_{VOC}\}_i$$

where:

i = subscript denoting an individual coating employed in this emissions unit; and

n = the total number coatings employed in this emissions unit

- f. the average hourly VOC emissions from this emissions unit, defined as "H<sub>VOC</sub>", in pounds per hour, and shall be calculated as follows:

$$H_{VOC} = D_{VOC} \div OT$$

[Authority for term: PTI 02-21701 and OAC rule 3745-77-07(C)(1)]

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

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



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

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-21701 and OAC rule 3745-17-11(C)]

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

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

- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

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

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

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

- (7) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxics Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the



composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[Authority for term: PTI 02-21701]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each day during which the average hourly VOC emissions from this emissions unit exceeded 1.86 pounds per hour; and
  - b. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation;

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and PTI 02-21701]

f) Testing Requirements

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

VOC emissions from this emissions unit shall not exceed 1.86 lbs/hr and 8.15 tpy.

Applicable Compliance Method:

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

The tpy emission limitation was developed by multiplying the short-term allowable VOC emission limitation (1.86 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21701]



**Proposed Title V Permit**

Plastpro Inc-Ashtabula Plant

**Permit Number:** P0109355

**Facility ID:** 0204000441

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



**2. R004, Paint booth no. 2**

**Operations, Property and/or Equipment Description:**

Paint spray booth no. 2 for coating of fiberglass reinforced plastic parts with a fiberglass filter to control particulate emissions

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) d(8)

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(F) (PTI P0116431 issued 03/20/2014)	Volatile organic compound (VOC) emissions shall not exceed 148 lbs/day and 9.9 tons/year.  See b)(2)a.
b.	OAC rule 3745-17-11(C)	See b)(2)b. and c)(1).
c.	40 CFR Part 63, Subpart P 40 CFR 63.4480 - 63.4581	See B.5.
d.	OAC rule 3745-21-07(M)	See b)(2)c.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)d.
f.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)e.

(2) Additional Terms and Conditions

a. PTI P0116431 establishes the following legally and practically enforceable emission limitations, as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. VOC emissions shall not exceed 148 lbs/day and 9.9 tons/year.

b. The permittee shall operate the dry particulate filter system, associated with an emissions unit, whenever the emissions unit is in operation.



- c. This emissions unit is not equipped with control equipment for organic compound emissions. In accordance with OAC rule 3745-21-07(M)(3), this emissions unit is not subject to the requirements of OAC rule 3745-21-07(M)(2).
- d. Best Available Technology (BAT) requirements for this emissions unit has been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F).

The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the requirements of OAC rule 3745-31-05(A)(3), as effective November 30, 2001, will no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC from this air contaminant source since the calculated annual emissions rate for VOC is less than ten tons per year taking into account the voluntary restriction established pursuant to OAC rule 3745-31-05(F).

c) **Operational Restrictions**

- (1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee.
  - a. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
  - b. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C) and PTI P0116431]



d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and PTI P0116431]

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and PTI P0116431]

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and PTI P0116431]

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

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and PTI P0116431]

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated



according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and PTI P0116431]

- (6) The permittee shall collect and record the following information for each day for this emissions unit:
- a. the company identification for each coating and cleanup/purge material employed;
  - b. the number of gallons of each coating and cleanup material/purge material employed;
  - c. the VOC content of each coating and cleanup/purge material, in lbs/gal;
  - d. the total VOC emissions rate for all coatings and all cleanup/purge materials, in lbs/day.

[Notes: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116431]

- (7) The permittee shall calculate and record the total annual VOC emissions from all coatings and all cleanup/purge materials, i.e., the sum of the daily VOC emission rates for the calendar year in d)(6)d.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116431]

- (8) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year or is subject to a federal standard in 40 CFR Part 63. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: PTI P0116431]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for this emissions unit:
- a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any



documented modifications made by the permittee) when the emissions unit was in operation; and

- b. each day during which the daily VOC emissions rate exceeded 148 lbs/day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116431]

f) Testing Requirements

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

- a. Emission Limitation:

The VOC emissions shall not exceed 148 lbs/day for each day that any materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116431]

- b. Emission Limitation:

The VOC emissions shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(7).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116431]

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Mold Presses: P001,P002,P003,P004,P005,P006,P007,P008,

EU ID	Operations, Property and/or Equipment Description
P001	Compression mold press no. 1 of thermoset, fiberglass reinforced composite plastic parts.
P002	Compression mold press no. 2 of thermoset, fiberglass reinforced composite plastic parts.
P003	Compression mold press no. 3 of thermoset, fiberglass reinforced composite plastic parts.
P004	Compression mold press no. 4 of thermoset, fiberglass reinforced composite plastic parts.
P005	Compression mold press no. 5 of thermoset, fiberglass reinforced composite plastic parts.
P006	Compression mold press no. 6 of thermoset, fiberglass reinforced composite plastic parts.
P007	Compression mold press no. 7 of thermoset, fiberglass reinforced composite plastic parts.
P008	Compression mold press no. 8 of thermoset, fiberglass reinforced composite 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 P0112958 issued January 24, 2014].	Organic compound (OC) emissions shall not exceed 1224 lbs./month and 7.34 tons/yr. from all operations at each emissions unit.
b.	OAC rule 3745-21-07(M)	See b)(2)a.
c.	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)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	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. Emissions units P001 through P008 are not equipped with control equipment for organic compound 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).

c) Operational Restrictions

- (1) 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 3745-77-07(A)(1), OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and PTI P0112958]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
  - a. the identification of each mold compound 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 month, calculated as specified:

$$E_p = (EF) \sum_{i=1}^n [(WT \times HAP)]_i$$

where:

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

HAP = the weight percent of available organic HAP used (e.g., styrene, vinyl toluene and/or methyl methacrylate) in each mold compound;

EF = an emissions factor for HAP emissions which is 0.015 lb. HAP emissions per lb. of available organic HAP input from American National Standards Institute, Inc. and American Composites Manufacturers Association. (2011). *ANSI/ACMA/IICPA UEF-1-2011a: Estimating emission factors from open molding and other composite processes*. The emissions factor was developed from styrene emission testing for SMC Compression Molding, conducted beginning August 11, 2008, ending September 4, 2008 by Engineering



Environmental Consulting Services. Equivalent, alternative method(s), as approved by Ohio EPA may be employed;

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112958]

- (2) The permittee shall maintain a record of a certified statement regarding the compliance status of the work practice standard identified in c)(1). The sheet mold compound (SMC) slitter and mold charge loading apparatus at each press (P001 through P008) is a computer controlled system. The slitter will not start its next cycle to uncover the (polyester) film from the SMC until the loader starts to place the SMC charge onto the mold. The press operator is unable to change this function.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112958]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for each emissions unit: an identification of each month during which the OC emissions from the employment of mold compound(s) exceeded the monthly limit in b)(1)a., and the actual monthly OC emissions for each such month.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112958]

- (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 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and PTI P0112958]



- (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: OAC rule 3745-77-07(C)(1), 40 CFR 63.5905 and 63.5910, Table 14 of 40 CFR Part 63, Subpart WWWW and PTI P0112958]

f) Testing Requirements

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

- a. Emission Limitations:

The OC emissions from the employment of mold compounds shall not exceed 1224 lbs/month and 7.34 tpy from all operations at each emissions unit.

Applicable Compliance Methods:

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

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 40 CFR Part 60, Appendix A-4, 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 annual emission limitations may be demonstrated based upon the following equation(s):

$$OC(YR) = \{ \sum_{i=1}^n [E_p]_i \} \times \text{ton OC}/2000 \text{ lbs OC}$$

where:

$E_p$  = the OC emissions from all mold compounds, in pounds per month, as recorded in d)(1)c;

$i$  = subscript denoting individual monthly emissions from mold compounds; and

$n$  = the total number of months of mold compound employment.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112958]

g) Miscellaneous Requirements

- (1) None.