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

6/16/2014

Certified Mail

JIm Huston
Allied Moulded Products, Inc.
222 N. Union Street
Bryan, OH 43506

Facility ID: 0386010104
Permit Number: P0116577
County: Williams

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Bryan Times. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan; Indiana

PUBLIC NOTICE
6/16/2014 Issuance of Draft Air Pollution Title V Permit

Allied Moulded Products, Inc.
222 N. Union Street, P.O. BOX 587
Bryan, OH 43506
Williams County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0116577
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V operating permit for multiple bulk molding compound (BMC) mixers, injection & compression presses, and molding stations.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0386010104
Facility Name:	Allied Moulded Products, Inc.
Facility Description:	Plastics Products
Facility Address:	222 N. Union Street, Bryan, OH 43506
Permit #:	P0116577, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☒ Volatile Organic Compounds ☐ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☒ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☒ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	P0116655 – Emissions unit P056, effective 4/16/14. Change is allowables and associated terms and conditions established in accordance with OAC rule 3745-31-05(A)(3), as effective 11/30/01. P0116656 – Emissions units P057 & P058, effective 4/16/14. Change is allowables and associated terms and conditions established in accordance with OAC rule 3745-31-05(A)(3), as effective 11/30/01. Emissions unit P016 has been was shut down 4/1/14 and has been removed from the Title V renewal permit.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2	77-07(A)(13)	N	Lists insignificant emission units that have one or more applicable requirements.
B.3	N	40 CFR, Part 63, Subpart WWWW	States applicability of 40 CFR, Part 63, Subpart WWWW for the facility.
B.4	N	40 CFR, Part 63, Subpart PPPP	States applicability of 40 CFR, Part 63, Subpart PPPP for the facility
B.5	N	40 CFR, Part 63, Subpart WWWW	States applicability of 40 CFR, Part 63, Subpart WWWW for T003 - T006 (insignificant emission units)
B.6	77-07(C)(1) & 21-25		Lists applicability of OAC rule 3745-21-25 for T003 – T006 (insignificant emission units)

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P001 P003 P004 P005 P006 P048 P051 R001	Exempt	17-07(A)	N	Y	N	N	N	N	N	N	N	N	ND-These emissions units are exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
P001 P003 P004 P005 P006 P048 P051 R001	Exempt	17-11(B)	N	Y	N	N	N	N	N	N	N	N	ND-The uncontrolled mass rate of particulate emissions from each emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Williams County.
P001 P003 P004 P005 P006 P010 P011	None	21-25	N	N	N	Y	N	Y	Y	N	N	N	

P012 P013 P014 P015 P018 P019 P020 P022 P023 P024 P025 P026 P027 P028 P029 P030 P032 P033 P034 P035, P042 P043 P044 P047 P048 P049 P050 P052 P054 P056 P057 P058 P801 R001													
P004 P006 P048	119.88 lbs VOC/day and 21.88 tons VOC/yr	N	31-05(A)(3)(a)	N	N	Y	N	Y	Y	N	N	N	ET-Compliance shall be demonstrated based on the record keeping requirements specified in this permit.
P004 P006 P048	0.01 lb PE/hr and 0.05 ton	N	31-05(A)(3)(a)	N	N	Y	N	Y	Y	N	N	N	ET-The permittee may demonstrate compliance with the hourly PE limitation by using the following formula: PE (lb/hr) = [P x D x E x (1 - C)] where:

	PE/yr												P = maximum process weight rate, in lbs/hr (5550 lbs/hr); D = dry filler content of BMC, in percent by weight; E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*; and C = operating control efficiency of the baghouse (99.7 percent). *emission factor is based on a company study of the dust collected in the mix room If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. The tons/yr emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.01 lb/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 shall also be shown with the annual emission limitation.
P005	151.20 lbs VOC/day and 27.59 tons VOC/yr	N	31-05(A)(3)(a)	N	N	Y	N	Y	Y	N	N	N	ET-Compliance with the ton/yr shall be demonstrated based on the recordkeeping requirements specified in this permit. Lb/day represents the potential to emit, therefore no recordkeeping, reporting, or compliance method calculations are necessary to demonstrate compliance with the lb/day limitation.
P005	0.02 lb PE/hr and 0.09 ton PE/yr	N	31-05(A)(3)(a)	N	N	Y	N	Y	Y	N	N	N	ET-The permittee may demonstrate compliance with the hourly PE limitation by using the following formula: PE (lb/hr) = [P x D x E x (1 - C)] where: P = maximum process weight rate, in lbs/hr (7000 lbs/hr); D = dry filler content of BMC, in percent by weight; E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*; and C = operating control efficiency of the baghouse (99.7 percent). *emission factor is based on a company study of the dust collected in the mix room If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. The tons/yr emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.02 lb/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 shall also be shown with the annual emission limitation.

P004 P005 P006 P048	Visible PE shall not exceed 20% opacity, as a 6-minute average	N	31-05(A)(3)(a)	N	N	Y	N	Y	Y	N	N	N	ET-If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
P004 P005 P006 P048	62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 and P048, combined	N	31-05(D)	N	N	Y	N	Y	T	N	N	N	OR-The maximum annual styrene usage for emissions units P004 through P006 and P048, combined, shall not exceed 5000 tons. ET-Compliance shall be demonstrated based on the record keeping requirements specified in this permit.
P014 P015 P018 P019 P020 P034 P035 P042	0.67 lb VOC/hr& 2.93 tons VOC/yr	N	31-05(A)(3)(a), as effective 11/30/01	N	N	Y	N	Y	Y	N	N	N	ET - 0.67 lb VOC/hr represents each emissions units potential to emit, therefore, no record keeping, deviation reporting, or compliance method calculations are required. Compliance with the 2.93 tons VOC/yr shall be based on the recordkeeping requirements specified by the permit.
P014 P015 P018 P019 P020 P034 P035 P042 P057	None	N	31-05 (A)(3)(a)(ii), as effective 12/1/06	Y	N	N	N	N	N	N	N	N	ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year. The potential to emit for each emissions unit is 2.93 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.
P010 P011 P012 P013 P032	0.34 lb VOC.hr & 1.47 tons VOC/yr	N	31-05 (A)(3), as effective 11/30/01	N	N	Y	N	Y	Y	N	N	N	ET - 0.34 lb VOC/hr represents each emissions units potential to emit, therefore, no record keeping, deviation reporting, or compliance method calculations are required. Compliance with the 1.47 tons VOC/yr shall be based on the recordkeeping requirements specified by the permit.

P010 P011 P012 P013 P032	None	N	31-05(A)(3)(a)(ii), as effective 12/1/06	Y	N	N	N	N	N	N	N	N	ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from each air contaminant source since the potential to emit for VOC is less than ten tons per year. The potential to emit for this emissions unit is 1.47 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 250 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 tons.
P022 P023 P024 P025 P026 P027 P028 P029 P030 P049 P050	32.14 lbs OC/day & 5.87 tons OC/yr	N	31-05(A)(3)(a)	N	N	Y	N	Y	Y	N	N	N	ET- Compliance with the ton/yr shall be demonstrated based on the recordkeeping requirements specified in the permit. Lb/day represents the potential to emit, therefore no recordkeeping, reporting, or compliance method calculations are necessary to demonstrate compliance with the lb/day limitation.
P033	0.15 lb VOC/hr& 0.64 ton VOC/yr	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp and ET-The emission limitations are based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. *The potential to emit for this emissions unit is based on a maximum throughput of 109 lbs BMC per hour, multiplied by a maximum resin content of 0.24 lb resin per lb BMC (24%), then multiplied by a maximum resin styrene (VOC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%) (the emissions factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).
P043 P044	0.30 lb VOC/hr& 1.32 tons VOC/yr	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp and ET-The emission limitations are based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. *The potential to emit for this emissions unit is based on a

													maximum throughput of 225 lbs BMC per hour, multiplied by a maximum resin content of 0.24 lb resin per lb BMC (24%), then multiplied by a maximum resin styrene (OC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%) (the emissions factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources). The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000.
P047	1.34 lbs VOC/hr& 5.87 tons VOC/yr	N	31-05(A)(3)(a), as effective 11/30/01	N	N	Y	N	Y	Y	N	N	N	ET - 1.34 lbs VOC/hr represents the emissions units potential to emit, therefore, no record keeping, deviation reporting, or compliance method calculations are required. Compliance with the 5.87 tons VOC/yr shall be based on the recordkeeping requirements specified by the permit.
P047	None	N	31-05 (A)(3)(a)(ii), as effective 12/1/06	N	N	N	N	N	N	N	N	N	ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year. The potential to emit for this emissions unit is 5.87 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 1000 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 tons.
P052	0.68 lb VOC/yr& 2.98 tons VOC/yr	N	31-05(A)(3), as effective 11/30/01	N	N	Y	N	Y	Y	N	N	N	ET – 0.68 lb VOC/hr represents the emissions units potential to emit, therefore, no record keeping, deviation reporting, or compliance method calculations are required. Compliance with the 2.98 tons VOC/yr shall be based on the recordkeeping requirements specified by the permit.
P052	None	N	31-05 (A)(3)(a)(ii), as effective 12/1/06	N	N	N	N	N	N	N	N	N	ET – 0.34 lb VOC/hr represents the emissions units potential to emit, therefore, no record keeping, deviation reporting, or compliance method calculations are required. Compliance with the 1.49 tons VOC/yr shall be based on the recordkeeping requirements specified by the permit.

P054	0.34 lb VOC/hr& 1.49 tons VOC/yr	N	31-05 (A)(3), as effective 11/30/01	N	N	Y	N	Y	Y	N	N	N	ET – 0.34 lb VOC/hr represents the emissions units potential to emit, therefore, no record keeping, deviation reporting, or compliance method calculations are required. Compliance with the 1.49 tons VOC/yr shall be based on the recordkeeping requirements specified by the permit.
P054	None	N	31-05(A)(3)(a)(ii), as effective 12/1/06	N	N	N	N	N	N	N	N	N	ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to organic compounds from these air contaminant sources since the uncontrolled potential to emit for organic compounds is less than ten tons per year. The potential to emit for these emissions units is 1.49 tons OC per year and was determined by multiplying a maximum emission rate of 0.34 lb OC/hr by a maximum operating rate of 8760 hrs/yr and dividing 2000 lbs/ton (see permit for how 0.34 lb VOC/hr was determined).
P801	1815 lbs VOC/month and 10.89 tons VOC/yr	N	31-05(A)(3)(a)	N	N	Y	N	Y	Y	N	N	N	ET-Compliance shall be based on the recordkeeping in this permit.
R001	8.66 lbs VOC/hr& 37.93 tons VOC/yr	N	31-05 (A)(3)	N	N	Y	N	Y	Y	N	N	N	8.66 lbs VOC/hr represents the emissions unit potential to emit, therefore, no record keeping, deviation reporting, or compliance method calculations are required. Compliance with the 37.93 tons VOC/yr shall be based on the recordkeeping requirements specified by the permit.
R001	None	17-11(C)	N	N	Y	Y	N	Y	Y	N	N	N	OR – Use of dry filtration system for control of particulate emissions when the emissions unit is in operation. System shall be maintained in accordance with the manufacturer's recommendations, instructions, and/or operating manual. In the event system is not operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual, the control device shall be expeditiously repaired or otherwise returned to the documented operating conditions. ET- Not Applicable
P001 P003 P004 P005 P006	See Rule	N	40 CFR, Part 63, Subpart WWWW	N	N	Y	N	Y	Y	N	N	N	ET – Testing and initial compliance requirements as defined in Table 9 of the rule (varies depending on process i.e. molding, mixing, etc.). See permit for emissions unit specific ET associated with Table 9 of rule.

P010 P011 P012 P013 P014 P015 P018 P019 P020 P022 P023 P024 P025 P026 P027 P028 P029 P030 P032 P033 P034 P035 P042 P043 P044 P047 P048 P049 P050 P052 P054 P056 P057 P058 P801 R001													
P056 P057 P058	None	31-05(A)(3), as effective 11/30/01	N	N	N	Y	N	Y	Y	N	N	N	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 are equivalent to the requirements of 40 CFR, Part 63, Subpart WWWW.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Allied Moulded Products, Inc.

Facility ID:	0386010104
Permit Number:	P0116577
Permit Type:	Renewal
Issued:	6/16/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Allied Moulded Products, Inc.

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Authorization

Facility ID:	0386010104
Facility Description:	Plastics Products
Application Number(s):	A0050402
Permit Number:	P0116577
Permit Description:	Renewal Title V operating permit for multiple bulk molding compound (BMC) mixers, injection & compression presses, and molding stations.
Permit Type:	Renewal
Issue Date:	6/16/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0106710

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

Allied Moulded Products, Inc.
222 N. Union Street
P.O. BOX 587
Bryan, OH 43506

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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, Northwest 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

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 recordingsfor 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 submittedscheduled 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, Northwest 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, Northwest 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, Northwest 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 permitexcept 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

Officialthat, 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, Northwest 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, Northwest 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 intermittentconsistent 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, Northwest 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, Northwest 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, noemissions unit identified in this permit that has beencertified 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 RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest 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, Northwest 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 RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

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

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

27. Scheduled Maintenance/Malfunction Reporting 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, Northwest 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, Northwest 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.

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 ofan 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, Northwest 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.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

T003	Styrene resin tank #7480
T004	Styrene resin tank #7481
T005	Styrene resin tank #6716
T006	Styrene resin tank #6717

   [OAC rule 3745-77-07(A)(13)]

3. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P001, P003-P006, P010-P015, P018-P020, P022-P030, P032-P035, P042-P044, P047-P050, P052, P054, P056 through P058, P801, R001 and T003-T006. 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, Northwest District Office.

   [40 CFR, Part 63, Subpart WWWW]

4. Allied Moulded Products, Inc. is not subject to 40 CFR Part 63, Subpart PPPP in accordance with 40 CFR 63.4481(b) since the use of coatings per year that contain hazardous air pollutants (HAPs) in the surface coating of plastic parts is not more than 378 liters (100 gallons) per year. If the use of coatings that contain HAPs in the surface coating of plastic parts exceeds 378 liters (100 gallons) per year, then the permittee shall comply with the applicable restrictions required und 40 CFR Part 63, Subpart PPPP, including 63.4480 through 63.4581.

   [40 CFR, Part 63, Subpart PPPP]

5. The permittee shall comply with the applicable requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections, for the following insignificant emission units T003 through T006:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
63.5805(b)	The permittee shall comply with the applicable standards required for all operations at existing facilities not listed in 63.5805(a) pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #3 for new or existing materials HAP-containing material storage operations.

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and Initial Compliance Requirements – By what date must I conduct a performance test or other initial compliance demonstration?
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements
63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (g) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]
63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept
63.5925	Table 15 of Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply

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

6. The permittee shall comply with the applicable requirements of OAC rule 3745-21-25, including the following sections, for emissions units T003 through T006:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates
OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements
OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit

	application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

C. Emissions Unit Terms and Conditions

1. P001, Mixer Asset #48

Operations, Property and/or Equipment Description:

Mixer Asset #48

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 3745-17-07(A)	None, see b)(2)a.
b.	OAC rule 3745-17-11(B)	None, see b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., d)(1), and e)(1)
d.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) this emissions unit is an existing affected source consisting of a mixing operation at a reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)d. See b)(2)e., d)(2), e)(2) and f)(1)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.

c. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emissions unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations and Item #3 for material storage operation.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

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

f) Testing Requirements

(1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #3, #6, #7, and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

(1) None.

2. P003, Mixer Asset #656

Operations, Property and/or Equipment Description:

Mixer Asset #656

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 3745-17-07(A)	None, see b)(2)a.
b.	OAC rule 3745-17-11(B)	None, see b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., d)(1), and e)(1)
d.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) this emissions unit is an existing affected source consisting of a mixing operation at a reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)d. See b)(2)e., d)(2), e)(2) and f)(1)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emissions (PE) limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I

of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.

c. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations and Item #3 for material storage operation.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept

63.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

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

f) Testing Requirements

(1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #3, #6, #7, and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

(1) None.

3. P005, High Shear Blender #6066

Operations, Property and/or Equipment Description:

0.80 TPH high shear mixer asset 6066.

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)(a) (PTI #03-17421, issued 5/7/09)	151.20 lbs volatile organic compound (VOC)/day and 27.59 tons VOC/yr 0.02 lb particulate emissions (PE)/hr and 0.09 ton PE/yr Visible PE shall not exceed 20% opacity, as a six-minute average See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI #03-17421, issued 5/7/09)	62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 and P048, combined See b)(2)b.
c.	OAC rule 3745-17-11(B)	None, see b)(2)c.
d.	OAC rule 3745-17-07(A)	None, see b)(2)d.
e.	OAC rule 3745-21-25	See b)(2)e., d)(5), and e)(3)
f.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of mixing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)f. See b)(2)g., d)(6), e)(4) and f)(3)
g.	40 CFR 63.1 – 16	Table 15 to Subpart WWWW of 40 CFR,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.5925)	Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse with a 99.7% control efficiency and compliance with the terms and conditions of this permit.

b. PTI 03-17421, issued on May 7, 2009 established the following federally enforceable emission limitation for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:

i. 62.5 tons VOC per rolling, 12-month period based on material usage restrictions for emission units P004 through P006 & P048, combined.

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Williams County.

d. This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

e. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

f. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations and Item #3 for material storage operation.

g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) The maximum annual styrene usage for emissions units P004 through P006 & P048, combined, shall not exceed 5000 tons.

[OAC rule 3745-77-07 (A)(1) and PTI# 03-17421]

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC rule 3745-77-07 (A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements in Permit to Install #03-17421, issued on May 7, 2009: [d)(2)]. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-01 (C)(1) and PTI# 03-17421]

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

a. the company identification for each bulk molding compound formulation mixed;

b. the number of pounds of each bulk molding compound formulation mixed;

c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;

d. the total VOC emission rate for all bulk molding compounds mixed, in pounds, calculated as follows:

VOC emissions (lbs/day) = summation of [(Pi x Si x EF)] for i = 1 to n

where:

i = 1, 2, ...n;

n = the total number of different types of bulk molding compounds;

Pi = the number of pounds per day of bulk molding compound i mixed;

Si = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed; and

EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed);

*This emission factor is based on information supplied by the permittee.

e. the annual year-to-date VOC emissions from all bulk molding compounds mixed, in tons [sum of d)(2)d. for each calendar month to date from January to December times1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(3) The permittee shall collect and record the following information each month for emissions units P004 through P006 & P048, combined:

a. the company identification for each bulk molding compound formulation mixed;

b. the number of pounds of each bulk molding compound formulation mixed;

c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;

d. for the first 12 months of operation, the cumulative monthly emission rate of VOC, from all bulk molding compound formulations mixed, in lbs/month, calculated as follows:

VOC emissions (lbs/month) = summation of [(Pi x Si x EF)] for i = 1 to n

where:

i = 1, 2, ...n;

n = the total number of different types of bulk molding compounds;

Pi = the number of pounds per month of bulk molding compound i mixed;

Si = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed;

EF = 0.0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed);

*This emission factor is based on information supplied by the permittee.

e. the annual VOC emissions, in tons from all bulk mold compound formulations mixed, based upon a rolling, 12-month summation; and

f. the annual styrene usage, in tons, based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(5) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept

53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. any exceedances of the 62.5 tons VOC/rolling, 12-month period for emissions units P004 through P006 and P048 combined; and

ii. any exceedance of the maximum annual styrene usage rate of 5000 tons for emissions units P004 through P006 and P048 combined, based on a rolling, 12-month summation of monthly styrene usage;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>
151.20 lbs VOC/day and 27.59 tons VOC/yr

<u>Applicable Compliance Method:</u>
The daily emissions limitation represents the potential to emit* for the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was determined by multiplying a maximum BMC usage rate of 7000 lbs/hr by the maximum daily hours of operation (24 hours), by a maximum VOC (styrene) content of 7.2%, by an emission factor of 1.25%.

Compliance with the 27.59 tons VOC/yr shall be demonstrated based on the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

b. Emission Limitations:
0.02 lb PE/hr and 0.09 ton PE/yr

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly PE limitation by using the following formula:

PE (lb/hr) = [P x D x E x (1 - C)]

where:

P = maximum process weight rate, in lbs/hr (7000 lbs/hr);

D = dry filler content of BMC, in percent by weight;

E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*; and

C = operating control efficiency of the baghouse (99.7 percent).

*emission factor is based on a company study of the dust collected in the mix room

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The TPY emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.02 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, provided compliance is shown with the short-term allowable emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

c. Emission Limitation:
62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 and P048, combined

Applicable Compliance Method:
Compliance shall be demonstrated based on the record keeping requirements specified in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

d. Emission Limitation:
The maximum annual styrene usage for emissions units P004 through P006 & P048, combined, shall not exceed 5000 tons per year, based on a rolling, 12-month summation of the styrene usage.

Applicable Compliance Method:
Compliance shall be demonstrated based on the record keeping requirements specified in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

e. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(2) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #3,#6, #7, and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

4. P047, Injection Press #1726

Operations, Property and/or Equipment Description:

Injection Press - Bulk Molding Compound (No. 1726)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0106576 issued 9/21/11)	1.34 lbs volatile organic compound VOC/hr and 5.87 tons VOC/yr See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., d)(2) and e)(2)
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) this emissions unit is an existing affected source consisting of an injection (closed) molding operation].	Standards – 40 CFR 63.5805(b) – See b)(2)d. See b)(2)e., d)(3), e)(3), and f)(2)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (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 pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year.

The potential to emit for this emissions unit is 5.87 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 1000 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

c. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using injection molding and Item #3 for material storage operation.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification of each bulk mold compound employed;

b. the pounds of each bulk mold compound employed;

c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;

d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor*];

*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources.

e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and

f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar month to date from January to December times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #P0106576]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106576 and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total volatile organic compound emissions from the emissions unit for the previous calendar year. These

reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0106576]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1), PTI #P0106576 and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
1.34 lbs VOC/hr

<u>Applicable Compliance Method:</u>
The hourly emissions limitation represents the potential to emit* for the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate of 40 CFR, Part 60, Appendix A.

*The potential to emit for this emissions unit was determined by multiplying a maximum BMC usage rate of 1000 lbs/hr by a maximum VOC (styrene) content of 7.2% and by an emission factor of 1.86%.

b. <u>Emission Limitation</u>:
5.87 tons VOC/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0106576]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

(3) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P052, RTM Station 1

Operations, Property and/or Equipment Description:

Resin transfer molding station 1.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0106575 issued 8/18/11)	0.68 lb volatile organic compounds (VOC)/hr and 2.98 tons VOC/yr See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., b)(2)d., d)(2), and e)(2)
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) this emissions unit is an existing affected source consisting of a Resin Transfer Molding (closed molding) operation.	Standards - 40 CFR 63.5805(b) – See b)(2)e. See b)(2)f., b)(2)g., d)(3), e)(3) and f)(2)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001,

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compounds from this air contaminant source since the uncontrolled potential to emit for volatile organic compounds is less than ten tons per year.

The potential to emit for this emissions unit is 2.98 tons VOC/yr and was determined by multiplying a maximum resin paste usage rate of 168 lbs/yr by 0.286 lb OC/lb resin paste employed by an emission factor of 0.01 lb OC/lb of OC applied added to a maximum mold release usage rate of 0.20 lb/hr multiplied by 1lb OC/lb mold release employed multiplied by an emission factor of 1 lb OC/lb mold release applied.

c. Pursuant to OAC rule 3745-21-25, (C)(1) and (C)(2), the resin transfer molding and mold release agents are not affected operations at a reinforced plastic composites production facility and therefore are excluded from the requirements of this rule. The VOC-containing material storage associated with the resin transfer molding is an affected operation and is therefore subject to the requirements of this rule [See b)(2)d. d)(2), and e)(2)].

d. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5) and (D)(6)	VOC control requirements
OAC rule 3745-21-25(F)(1), (F)(3), (F)(4), (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

e. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of

40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item#3 for material storage operation.

f. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

g. Pursuant to 40 to 40 CFR 63.5790(c), the application of release agents is excluded from any of the requirements of 40 CFR Part 63, Subpart WWWW.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each resin paste/mold release agent employed;

b. the amount of each paste/mold release agent employed, in pounds;

c. the volatile organic compound content, in percent by weight, for each resin paste/mold release agent employed;

d. the volatile organic compound emission rate for each resin paste/mold release agent employed, in lbs/month [i.e., d)(1)b. x d)(1)c. x an emission factor of 0.01 lb VOC/ lb VOC in resin paste employed or 1.0 lb VOC/lb VOC in mold release agent employed] for each resin paste/mold release employed;

e. the total volatile organic compound emission rate for all resin pastes/mold release agents employed, in lbs/month [i.e., the sum of d)(1)d.]; and

f. the annual year-to-date volatile organic compound emissions from all resin pastes/mold release agents employed, in tons [i.e., the sum of d)(1)e. for each calendar month to date from January to December x 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #P0106575]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106575 and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #P0106575, and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total volatile organic compound emissions from emissions unit P052 for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0106575]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4) and (Q)(5)	Reporting requirements
OAC rule 3745-21-25(S)(1) and (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1), PTI #P0106575 and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #P0106575, and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
0.68 lb VOC/hr

Applicable Compliance Method:
The hourly VOC emission limitation was developed by multiplying a maximum resin paste usage rate of 168 lbs/yr by 0.286 lb VOC/lb resin paste employed by an emission factor of 0.01 lb VOC/lb of VOC applied added to a maximum mold release usage rate of 0.20 lb/hr multiplied by 1lb VOC/lb mold release employed multiplied by an emission factor of 1 lb VOC/lb VOC in mold release applied.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
2.98 tons VOC/yr

Applicable Compliance Method: Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in section d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0106575]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106575, and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

6. P054, Assembly 1

Operations, Property and/or Equipment Description:

Assembly station 1.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0106575 issued 8/18/11)	0.34 lb volatile organic compound (VOC)/hr and 1.49 tons VOC/yr See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., d)(2) and e)(2)
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(b) and 63.5795(b) this emissions unit is an existing affected source which includes open molding (manual application) operations.	Standards - 40 CFR 63.5805(b) – See b)(2)d. See b)(2)e., b)(2)f., d)(3), e)(3) and f)(2)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS

pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compounds from this air contaminant source since the uncontrolled potential to emit for volatile organic compounds is less than ten tons per year.

The potential to emit for this emissions unit is 1.49 tons VOC/yr and was determined by multiplying a maximum emission rate of 0.34 lb VOC/hr by a maximum operating rate of 8760 hrs/yr and dividing by 2000 lbs/ton. The maximum lb/hr emission rate was determined using the following:

Raw Material	Maximum Throughput (lb/hr)	VOC Employed	VOC Content (lb VOC/lb thinned gelcoat or adhesive]	Emission Factor lb VOC emitted/lb VOC applied	Lb/hr VOC emitted
Thinned Gelcoat	0.8	Styrene	0.299	0.1257	0.03
Thinned Gelcoat	0.8	MMA	0.034	0.2118	0.006
Thinned Gelcoat	0.8	Acetone	0.125	1	0.10
Adhesive	4	MMA	0.60	0.05	0.12
Adhesive	4	MAA	0.40	0.05	0.08
Total					0.34

c. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), (D)(6), and (D)(7)	VOC control requirements
OAC rule 3745-21-25 (E)(1) and (E)(2)	Procedures for determination of VOC emission factors for reinforced plastic composites production operations and determination of monomer content of resins and gel coats
OAC rule 3745-21-25(F)(1), (F)(3),	Calculation of facility's VOC emissions

(F)(4), and (F)(5)	threshold
OAC rule 3745-21-25(G)(1), (G)(2), (G)(3), and (G)(4)	Options for meeting the VOC emissions limit for open molding and centrifugal casting operations
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emissions unit shall meet the requirements as stated in Table 3 of 40 CFR, Part 63, Subpart WWWW – Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting less than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP item #6 and Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #3 for HAP-containing materials storage operations.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

f. Pursuant to 40 to 40 CFR 63.5790(c), the application of adhesives is excluded from any of the requirements of 40 CFR Part 63, Subpart WWWW.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each thinned gelcoat/adhesive employed;

b. the amount of each thinned gelcoat/adhesive employed, in pounds;

c. the volatile organic compound content, in percent by weight, for each thinned gelcoat/adhesive employed;

d. the volatile organic compound emission rate for each thinned gelcoat/adhesive employed in lbs/month [i.e., d)(1)b. x d)(1)c. x the appropriate emission factor from the table listed below] for each thinned gelcoat/adhesive employed;

Raw Material	VOC Employed	Emission Factor lb VOC emitted/lb VOC applied
Thinned Gelcoat	Styrene	0.1257
Thinned Gelcoat	MMA	0.2118
Thinned Gelcoat	Acetone	1
Adhesive	MMA	0.05
Adhesive	MAA	0.05

e. the total volatile organic compound emission rate for all thinned gelcoats/adhesives employed, in lbs/month [i.e., sum of d)(1)d.]; and

f. the annual year-to-date volatile organic compound emissions from all thinned gelcoats/adhesives employed, in tons [i.e., sum of d)(1)e. for each calendar month to date from January to December x 1 ton/2000lbs].

[OAC rule 3745-77-07(C)(1) and PTI #P0106575]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Recordkeeping requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106575 and OAC rule 3745-21-25]

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

63.5915(a) (c), and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #P0106575, and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total volatile organic compound emissions from emissions unit P054 for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0106575]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4) and (Q)(5)	Reporting requirements
OAC rule 3745-21-25(S)(1) and (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1), PTI #P0106575 and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #P0106575, and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation: 0.34 lb VOC/hr

Applicable Compliance Method: The hourly VOC emission limitation was developed by multiplying a maximum throughput of each raw material by the lb VOC/ lb raw material by an emission factor of lb VOC emitted/lb VOC applied.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate of 40 CFR, Part 60, Appendix A.

b. Emission Limitation: 1.49 tons VOC/yr

Applicable Compliance Method: Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in section d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0106575]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106575, and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

7. P801, Plantwide CU

Operations, Property and/or Equipment Description:

Facility wide cleanup operations.

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)(a) (PTI# P0103672, issued 3/24/09)	1815 lbs organic compounds (OC)/month and 10.89 tons OC/yr See b)(2)e.
b.	OAC rule 3745-21-25	See b)(2)a., d)(2), and e)(3)
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) In accordance with 40 CFR 63.5790(a) and 63.5795 (b) this emissions unit is an existing affected source consisting of cleaning operations.	Standards - 40 CFR 63.5805(b) - See b)(2)c. See b)(2)b., b)(2)d., d)(3), e)(4) and f)(2)
d.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements

OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

b. 40 CFR, Part 63, Subpart WWWW shall only apply to cleaning operations associated with reinforced plastic composites production as defined in 40 CFR Part 63.5785.

c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #2 for new or existing cleaning operations and Item #3 for HAP-containing materials storage operations.

d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

e. The 10.89 tons organic compounds per year is not representative of the potential to emit volatile organic compounds (VOC) from this emissions unit. The potential to emit VOC is 0.69 ton per year and is based on the following:

(3,300 gallons solvent employed/yr) (0.42 lb VOC/gallon solvent employed*) (1 ton/2000 lbs

*VOC content usage restriction contained in OAC rule 3745-21-25 Table I, (Work Practice Standards as required in paragraph (D) (1) of OAC rule 3745-21-25).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit P801:

a. the company name and identification for each cleanup material employed;

b. the volume, in gallons, of each cleanup material employed;

c. the OC content of each cleanup material employed, in pound per gallon;

d. the OC emission rate, in pounds, for each cleanup material employed [(d)(1)b. times d)(1)c.];

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

e. the total OC emissions rate from all cleanup materials employed [summation of d)(1)d.]; and

f. the annual year-to-date OC emissions, in tons, from all cleanup materials employed [summation of d)(1)e. for each calendar month to date from January to December times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI# P0103672]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1), PTI# P0103672, and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI# P0103672 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) In lieu of the quarterly deviation (excursion) reports* required by the Standard Terms and Conditions of this permit for the 10.89 tons VOC per year emission limitation, the permittee shall submit annual reports that specify the total volatile organic compound emissions from this emissions unit for the previous calendar year. The annual reports shall be submitted by January 31 of each year.

*It should be noted that quarterly written reports of other deviations as specified in term c)(2) are still required to be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI# P0103672]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1), PTI #P0103672, and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI# P0103672 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
1815 lbs OC/month & 10.89 tons OC/yr from cleanup operations

<u>Applicable Compliance Method:</u>
Compliance shall be based on the recordkeeping in section d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI# P0103672]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance

	tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #2 and #3 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI# P0103672 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

8. R001, Gelcoat Spray Booth

Operations, Property and/or Equipment Description:

Gelcoat application booth.

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 #P0106575, issued 8/18/11)	8.66 lbs volatile organic compounds (VOC)/hr& 37.93 tons VOC/yr See b)(2)a.
b.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(4) through d)(8), and e)(4)
c.	OAC rule 3745-21-25	See b)(2)b., d)(2) and e)(2)
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5795(a), this emission unit is a new affected source consisting of open molding with atomized spray gel coat application at an existing reinforced plastic composites production facility.]	Organic HAP Emissions Factors – 40 CFR 63.5796 through 63.5799 – See b)(2)c. Standards – 40 CFR 63.5805(b) – See b)(2)d. See b)(2)e., b)(2)f., d)(3), (e)(3) and f)(2)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The emission limitation of 8.66 lbs VOC/hr was established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

b. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5) and (D)(6)	VOC control requirements
OAC rule 3745-21-25(E)(1) and (E)(2)	Procedures for determination of VOC emission factors for reinforced plastic composites production operations and determination of monomer content of resins and gel coats
OAC rule 3745-21-25(F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(G)(1), (G)(2), (G)(3) and (G)(4)	Options for meeting the VOC emissions limits for open molding and centrifugal casting operations
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

c. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5796	Organic HAP emissions factor equations in Table 1 of this subpart and how they are used in this subpart [See Table 1, Item #1.f. of this subpart]
63.5797(a) – (c)	Determination of organic HAP content of resins and gel coats
63.5798(a) and (b)	If use or manufacture an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 of this subpart
63.5799(a) – (c)	Calculating facility's organic HAP emissions on a ton per year basis for purposes of determining which paragraphs of 63.5805 apply

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the emission limitations stated in Table 3 of 40 CFR, Part 63, Subpart WWWW – Organic HAP Emission Limitations – Item #6 for open molding gel coat operations and Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #3 for HAP-containing materials storage operations.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

f. The permittee shall comply with the standards for this emission unit by using the following compliance option:

63.5810	Options for meeting the standards for open molding operations at new or existing sources

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI# P0106575]

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

[OAC rule 3745-77-07(A)(1) and PTI# P0106575]

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification of each gelcoat employed;

b. the amount of each gelcoat employed, in pounds;

c. the VOC content, in percent by weight, for each gelcoat employed;

d. the VOC emission rate from each gelcoat employed, in pounds per month [i.e., d)(1)b. x d)(1)c. x 0.75 lb VOC/lb MMA or X lb (VOC)/lb styrene, where X is

calculated as specified for spray gelcoat application under the Unified Emission Factors for Open Molding of Composites.;

e. the total VOC emission rate from all gelcoats employed, in pounds per month [i.e., sum of d)(1)d.]; and

the annual, year-to-date VOC emissions from all gelcoats employed, in tons (sum of d)(1)e.. for each calendar month to date from January to December x 1 ton/2000 lbs).

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1) and (O)(2)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Recordkeeping requirements

[OAC rule 3745-77-07(C)(1), PTI# P0106575, and OAC rule 3745-21-25]

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

63.5895(c) and (d)	How to monitor and collect data to demonstrate continuous compliance
63.5915(a), (c) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI# P0106575 and 40 CFR, Part 63, Subpart WWWW]

(4) 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.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

(5) 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.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

(6) 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.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575

(7) 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.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

(8) 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.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total volatile organic compound emissions from the emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4) and (Q)(5)	Reporting requirements
OAC rule 3745-21-25(S)(1) and (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1), PTI# P0106575 and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI# P0106575 and 40 CFR, Part 63, Subpart WWWW]

(4) The permittee shall submit quarterly reports of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation. The reports shall be submitted in in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
8.66 lbs VOC/hr

<u>Applicable Compliance Method:</u>
The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum hourly gelcoat usage rate of 49.8 lbs/hr x the maximum monomer content of 0.045 lb MMA/lbgelcoat) x a company supplied VOC emission factor of 0.75 lb VOC/ lb MMA monomer + a maximum hourly gelcoat usage rate of 49.8 lbs/hr x the maximum monomer content of 0.315 lb styrene/lbgelcoat) x a company supplied VOC emission factor of 0.4451 lb VOC/ lb monomer styrene.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitations:
37.93 tons VOC/yr

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI# P0106575]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 8, Item #1 and Table 9, Item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI# P0103675 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -1000 lb/hr injection/compression: P022,P023,P024,P025,P026,P027,P029,P030,P049,P050,

EU ID	Operations, Property and/or Equipment Description
P022	Injection Press - Bulk Molding Compound (No. 465)
P023	Injection Press - Bulk Molding Compound (No. 462)
P024	Injection Press - Bulk Molding Compound (No. 481)
P025	Injection Press - Bulk Molding Compound (No. 482)
P026	Injection Press - Bulk Molding Compound (No. 811)
P027	Injection Press - Bulk Molding Compound (No. 480)
P029	Injection Press - Bulk Molding Compound (No. 1073)
P030	Injection Press - Bulk Molding Compound (No. 1074)
P049	Injection Press 1829
P050	Injection Press 1830

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)(a) (PTI# P0103671, issued 2/18/09)	32.14 lbs volatile organic compounds (VOC)/day and 5.87 tons VOC/yr from P022 – P030, P049 and P050, individually. See b)(2)a.
b.	OAC rule 3745-21-25	See b)(2)b. d)(3), and e(2)
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) these emissions units are existing affected sources consisting of injection/compression (closed) molding operations].	Standards - 40 CFR 63.5805(b) - See b)(2)c. See b)(2)d., d)(4), e)(3) and f)(2)
d.	40 CFR 63.1 – 16	Table 15 to Subpart WWWW of 40 CFR,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.5925)	Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for these emissions units has been determined to be compliance with the terms and conditions of this permit.

b. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5) and (D)(6)	VOC control requirements
OAC rule 3745-21-25(E)(1) and (E)(2)	Procedures for determination of VOC emission factors for reinforced plastic composites production operations and determination of monomer content of resins and gel coats
OAC rule 3745-21-25(F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(G)(1), (G)(2), (G)(3) and (G)(4)	Options for meeting the VOC emissions limits for open molding and centrifugal casting operations
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding and Item #3 for material storage operation.

d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC rule 3745-77-07 (A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements in Permit to Install #P0103671, issued on February 18, 2009: [d)(2)]. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(C)(1) and PTI# P0103671]

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

a. the company identification of each bulk mold compound employed;

b. the pounds of each bulk mold compound employed;

c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;

d. the VOC emissions for each bulk mold compound employed [d)(2)b. times d)(2)c. times 1.86% VOC volatilization emission factor*];

*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources

e. the total VOC emissions for all bulk mold compounds employed [sum of d)(2)d.]; and

f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(2)e. for each calendar month to date from January to December times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI# P0103671]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements

OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1), PTI# P0103671, and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI# P0103671 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) In lieu of the quarterly deviation (excursion) reporting requirements of the Standard Terms and Conditions of this permit, the permittee shall submit annual reports that specify the total volatile organic compound emissions from each emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and PTI# P0103671]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1), PTI# P0103671, and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI# P0103671 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:
32.14 lbs VOC/day and 5.87 tons VOC/yr from P022 – P030, P049 and P050, individually

Applicable Compliance Method:
The daily emissions limitation represents the potential to emit* foreach emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was determined by multiplying a maximum BMC usage rate of 1000 lbs/hr by the maximum daily hours of operation (24 hours), by a maximum VOC (styrene) content of 7.2%, by an emission factor of 1.86%.

Compliance with the 5.87 tons VOC/yremission limitation shall be demonstrated based on the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI# P0103671]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI# P0103671 and 40 CFR, Part 63, Subpart WWWW]

(3) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group -225 lbs/hr compression press: P043 and P044

EU ID	Operations, Property and/or Equipment Description
P043	Compression Press - Bulk Molding Compound (No. 1685)
P044	Compression Press - Bulk Molding Compound (No. 1686)

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 #03-16162, issued 8/24/04)	0.30 lb volatile organic compounds (VOC)/hr and 1.32 tons VOC/yr from P043 and P044, individually.
b.	OAC rule 3745-21-25	See b)(2)a., d)(1) and e)(1)
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) {In accordance with 40 CFR 63.5790(a) and 63.5795 (b) these emissions units are existing affected sources consisting of compression (closed) molding operations].	Standards - 40 CFR 63.5805(b) - See b)(2)b. See b)(2)c., d)(2), e)(2) and f)(3)
d.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5) and (D)(6)	VOC control requirements

OAC rule 3745-21-25(E)(1) and (E)(2)	Procedures for determination of VOC emission factors for reinforced plastic composites production operations and determination of monomer content of resins and gel coats
OAC rule 3745-21-25(F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(G)(1), (G)(2), (G)(3) and (G)(4)	Options for meeting the VOC emissions limits for open molding and centrifugal casting operations
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

b. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding and Item #3 for material storage operation.

c. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emissions limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>
0.30 lb VOC /hr and 1.32 tons VOC /yr from P043 and P044, individually

<u>Applicable Compliance Method:</u>
The emission limitations are based on the emission units' potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

*The potentials to emit for these emissions units are based on a maximum throughput of 225 lbs BMC per hour, multiplied by a maximum resin content of 0.24 lb resin per lb BMC (24%), then multiplied by a maximum resin styrene (VOC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%) (the emission factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).

The annual allowable VOC emission limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the short-term allowable emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

(2) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) The permittee shall maintain a current list of BMC raw materials in use which provides all of the VOC data necessary to evaluate compliance as described in f)(1) above. Such information shall be retained for at least 5 years after the issuance date of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

11. Emissions Unit Group -250 lb/hr compression press: P010,P011,P012,P013,P032,

EU ID	Operations, Property and/or Equipment Description
P010	Compression Press - Bulk Molding Compound (No. 7)
P011	Compression Press - Bulk Molding Compound (No. 13)
P012	Compression Press - Bulk Molding Compound (No. 9)
P013	Compression Press - Bulk Molding Compound (No. 31)
P032	Compression Press - Bulk Molding Compound (No. 665)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0106576, issued 9/21/11)	0.34 lb volatile organic compound (VOC)/hr and 1.47 tons VOC/yr from P010 through P013 & P032 individually See b)(2)a.
b.	OAC rule 3745-31-05(A)(as effective 12/1/06	See b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., d)(2), and e)(2)
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) these emissions units are existing affected sources consisting of compression (closed) molding operations].	Standards – 40 CFR 63.5805(b) – See b)(2)d. See b)(2)e., d)(3), e)(3), and f)(2)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (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 pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year.

The potential to emit for this emissions unit is 1.47 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 250 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

c. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using compression molding and Item #3 for material storage operation.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification of each bulk mold compound employed;

b. the pounds of each bulk mold compound employed;

c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;

d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor*];

*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources.

e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and

f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar month to date from January to December times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #P0106576]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106576 and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #P0106576 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total volatile organic compound emissions from the emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1), and PTI #P0106576]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07(C)(1), PTI #P0106576, and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
0.34 lb VOC/hr from each emissions unit, individually

Applicable Compliance Method:
The hourly emissions limitation represents the potential to emit* for the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was determined by multiplying a maximum BMC usage rate of 250 lbs/hr by a maximum VOC (styrene) content of 7.2% and by an emission factor of 1.86%.

b. Emission Limitation:
1.47 tons VOC/yr from each emission unit, individually

Applicable Compliance Method:
Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in section d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0106576]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

(3) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group -500 lb/hr injection/compression: P014,P015,P018,P019,P020,P034,P035,P042

EU ID	Operations, Property and/or Equipment Description
P014	Injection Press - Bulk Molding Compound (No. 35)
P015	Injection Press - Bulk Molding Compound (No. 3401)
P018	Injection Press - Bulk Molding Compound (No. 591)
P019	Injection Press - Bulk Molding Compound (No. 590)
P020	Injection Press - Bulk Molding Compound (No. 601)
P034	Compression Press - Bulk Molding Compound (No. 734)
P035	Compression Press - Bulk Molding Compound (No. 733)
P042	Injection Press - Bulk Molding Compound (No. 1439)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0106576, issued 9/21/11)	0.67 lb volatile organic compound (VOC)/hr and 2.93 tons VOC/yr from P014, P015, P018 through P020, P034, P035 and P042, individually. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., d)(2) and e)(2)
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) these emissions units are existing affected sources consisting of injection and compression (closed) molding operations].	Standards - 40 CFR 63.5805(b) – See b)(2)e. See b)(2)e., d)(3), e)(3), and f)(2)
e.	40 CFR 63.1 – 16	Table 15 to Subpart WWWW of 40 CFR,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.5925)	Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (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 pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year.

The potential to emit for this emissions unit is 2.93 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

c. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of

40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using injection and compression molding and Item #3 for material storage operation.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification of each bulk mold compound employed;

b. the pounds of each bulk mold compound employed;

c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;

d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor*];

*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources.

e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and

f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar month to date from January to December times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #P0106576]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-01 (C)(1), PTI #P0106576, and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-01 (C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total volatile organic compound emissions from the emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-01 (C)(1) and PTI #P0106576]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OACrule 3745-77-01 (C)(1), PTI #P0106576, and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-01 (C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
0.67 lb VOC/hrfrom each emissions unit individually

Applicable Compliance Method:
The hourly emissions limitation represents the potential to emit* for the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was determined by multiplying a maximum BMC usage rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% and by an emission factor of 1.86%.

b. Emission Limitation:
2.93 tons VOC/yr from each emission unit, individually

Applicable Compliance Method:
Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in d)(1).

[OACrule 3745-77-01 (C)(1) and PTI# P0106576]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OACrule 3745-77-01 (C)(1), PTI #P0106576, and 40 CFR, Part 63, Subpart WWWW]

(3) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

13. Emissions Unit Group -5550 lb/hr BMC Mixer Group: P004,P006,P048,

EU ID	Operations, Property and/or Equipment Description
P004	3.73 TPH sigma mixer asset 472.
P006	3.73 TPH sigma blade mixer 471.
P048	Bulk Molding Compound (BMC) Mixer - Asset 1867

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)(a) (PTI #03-17421, issued 5/7/09)	119.88 lbs volatile organic compound (VOC)/day and 21.88 tons VOC/yr from P004, P006, and P048 individually 0.01 lb particulate emissions (PE)/hr and 0.05 ton PE/yr from P004, P006, and P048 individually Visible PE shall not exceed 20% opacity, as a six-minute average See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI #03-17421, issued 5/7/09)	62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 and P048, combined See b)(2)b.
c.	OAC rule 3745-17-11(B)	None See b)(2)c.
d.	OAC rule 3745-17-07(A)	None See b)(2)d.
e.	OAC rule 3745-21-25	See b)(2)e., d)(5), and e)(3)
f.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of	Standards - 40 CFR 63.5805(b) - See b)(2)f. See b)(2)g., d)(6), e)(4) and f)(3)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	mixing operations at an existing reinforced plastic composites production facility.]	
g.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse with a 99.7% control efficiency and compliance with the terms and conditions of this permit.

b. PTI 03-17421, issued on May 7, 2009 established the following federally enforceable emission limitation for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:

i. 62.5 tons VOC per rolling, 12-month period based on material usage restrictions for emission units P004 through P006 & P048, combined.

c. The uncontrolled mass rate of particulate emissions from each emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Williams County.

d. These emissions units are exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

e. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

f. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7

and #8 for mixing and BMC manufacturing operations and Item #3 for material storage operation.

g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) The maximum annual styrene usage for emissions units P004 through P006 & P048, combined, shall not exceed 5000 tons.

[OAC rule 3745-77-07 (A)(1) and PTI# 03-17421]

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC rule 3745-77-07 (A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements in Permit to Install #03-17421, issued on May 7, 2009: [d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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

a. the company identification for each bulk molding compound formulation mixed;

b. the number of pounds of each bulk molding compound formulation mixed;

c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;

d. the total VOC emission rate for all bulk molding compounds mixed, in pounds, calculated as follows:

VOC emissions (lbs/day) = summation of [(Pi x Si x EF)] for i = 1 to n

where:

i = 1, 2, ...n;

n = the total number of different types of bulk molding compounds;

Pi = the number of pounds per day of bulk molding compound i mixed;

Si = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed; and

EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed);

*This emission factor is based on information supplied by the permittee.

e. the annual year-to-date VOC emissions from all bulk molding compounds mixed, in tons [sum of d)(2)d. for each calendar month to date from January to December times1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(3) The permittee shall collect and record the following information each month for emissions units P004 through P006 & P048, combined:

a. the company identification for each bulk molding compound formulation mixed;

b. the number of pounds of each bulk molding compound formulation mixed;

c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;

d. for the first 12 months of operation, the cumulative monthly emission rate of VOC, from all bulk molding compound formulations mixed, in lbs/month, calculated as follows:

VOC emissions (lbs/month) = summation of [(Pi x Si x EF)] for i = 1 to n

where:

i = 1, 2, ...n;

n = the total number of different types of bulk molding compounds;

Pi = the number of pounds per month of bulk molding compound i mixed;

Si = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed;

EF = 0.0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed);

*This emission factor is based on information supplied by the permittee.

e. the annual VOC emissions, in tons from all bulk mold compound formulations mixed, based upon a rolling, 12-month summation; and

f. the annual styrene usage, in tons, based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(5) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. any exceedances of the 62.5 tons VOC/rolling, 12-month period for emissions units P004 through P006 and P048, combined; and

ii. any exceedance of the maximum annual styrene usage rate of 5000 tons for emissions units P004 through P006 and P048, combined, based on a rolling, 12-month summation of monthly styrene usage;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>:
119.88 lbs VOC/day and 21.88 tons VOC/yrfrom P004, P006, and P048 individually

<u>Applicable Compliance Method:</u>
The daily emissions limitation represents the potential to emit* for the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was determined by multiplying a maximum BMC usage rate of 5550 lbs/hr by the maximum daily hours of operation (24 hours), by a maximum VOC (styrene) content of 7.2%, by an emission factor of 1.25%.

Compliance with the 27.59 tons VOC/yr shall be demonstrated based on the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

b. Emission Limitations:
0.01 lb PE/hr and 0.05 ton PE/yr from P004, P006, and P048, for each individually

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly PE limitation by using the following formula:

PE (lb/hr) = [P x D x E x (1 - C)]

where:

P = maximum process weight rate, in lbs/hr (5550 lbs/hr);

D = dry filler content of BMC, in percent by weight;

E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*; and

C = operating control efficiency of the baghouse (99.7 percent).

*emission factor is based on a company study of the dust collected in the mix room

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The TPY emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.02 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, provided compliance is shown with the short-term allowable emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

c. Emission Limitation:
62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 and P048, combined

Applicable Compliance Method:
Compliance shall be demonstrated based on the record keeping requirements specified in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

d. Emission Limitation:
The maximum annual styrene usage for emissions units P004 through P006 & P048, combined, shall not exceed 5000 tons per year, based on a rolling, 12-month summation of the styrene usage.

Applicable Compliance Method:
Compliance shall be demonstrated based on the record keeping requirements specified in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

e. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(2) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #3,#6, #7, and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

14. Emissions Unit Group P056, P057, & P058

EU ID	Operations, Property and/or Equipment Description
P056	Compression Press #No. 2823
P057	500 lbs/hr Compression Press
P058	1000 lb/hr Compression Press

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01 (PTI P0116655, issued 4/16/14 & PTI P0116656, issued 4/16/14)	See b)(2)a.
b.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)b.
c.	OAC rule 3745-21-25	See b)(2)c., d)(1), and e)(1)
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5790(a) and 63.5795 (b) this emissions unit is an existing affected source consisting of a compression (closed) molding operation].	Standards - 40 CFR 63.5805(b) – See b)(2)d. See b)(2)e., d)(2), e)(2), and f)(2)
e.	40 CFR 63.1 – 16 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 are equivalent to the requirements of 40 CFR, Part 63, Subpart WWWW.

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compounds from this air contaminant source since the uncontrolled potential to emit for volatile organic compounds is less than ten tons per year.

The potential to emit for this emissions unit is 2.93 tons VOC/yr and was determined by multiplying a maximum BMC usage rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

c. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1), (D)(2), (D)(5), and (D)(6)	VOC control requirements
OAC rule 3745-21-25 (F)(1), (F)(3), (F)(4), and (F)(5)	Calculation of facility's VOC emissions threshold
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using compression molding and Item #3 for material storage operation.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-01(C)(1), PTI #P0116655/#P0116656, and OAC rule 3745-21-25]

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

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-01(C)(1), PTI #P0116655/#P0116656, and 40 CFR Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(2)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-01(C)(1), PTI #P0116655/#P0116656, and OAC rule 3745-21-25]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-01(C)(1), PTI #P0116655/#P0116656, and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

(1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #1 and #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-01(C)(1), PTI #P0116655/#P0116656, and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.