



7/16/2014

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

Certified Mail

Facility ID: 0204020245
Permit Number: P0084209
County: Ashtabula

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 Star Beacon. 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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified 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, Northeast District Office at (330)425-9171.

Sincerely,

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

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

PUBLIC NOTICE
7/16/2014 Issuance of Draft Air Pollution Title V Permit

Continental Structural Plastics of Ohio LLC aka CSP OH
333 Gore Road,
Conneaut, OH 44030
Ashtabula County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0084209
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V Operating Permit

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



Statement of Basis For Air Pollution Title V Permit

Facility ID:	0204020245	Facility	Continental Structural Plastics of Ohio LLC aka CSP OH
Facility Description:	Fiberglass reinforced plastic composite parts manufacturing and painting		
Facility Address:	333 Gore Road, Conneaut,	Permit #:	P0084209, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> 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. NO.
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). NA
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). NA
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). NA
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): <ul style="list-style-type: none"> 02-19379 issued on 12-28-2004 for emissions unit K001 – Installation of new EU after previous TVPTO P0084208 issuance on 5-15-2002. PTI 02-18224 issued 9/23/2004: to designate SMC Line 1 as P001 and spin-off Cowles mixer as P028 (P028 considered as new EU); Chapter 31 modification at P025 to increase OC emissions from production & include restriction to only use non-VOC clean-up mtl.; Chap. 31 modification to increase OC emissions from production at P027 & include restriction to only use non-VOC clean-up mtl.



- 02-18224 issued on 4-12-2005 for emissions unit P027 only: for administrative modification to increase allowable, hourly OC emissions limit at 48 inch SMC Machine (P027).
- 02-22050 issued on 8-22-2006 for emissions unit P028 – PTI 02-18224 administratively modified on 4/12/2005 to change OC emission factor. PTI 02-22050 issued on 8/22/2006 is a Chapter 31 modification to increase hourly OC emissions from production. The styrene content of the paste and the total materials throughput were increased so potential OC emissions increased.
- P0115594 issued on 11-21-2013 for emissions units P030, P031, P032, P033 and P034: 02-21602 issued 8/29/2006 for installation of new EUs. P0115594 issued on 11-21-2013 is an administrative modification for use of more representative factor for estimating VOC, OC & HAP emissions with no process change and an increase in the allowable OC emissions limits.
- P0115595 issued on 6-10-2014 for emissions units P023 and P024: administrative modification for use of more representative factor for estimating VOC, OC & HAP emissions with no process change and an increase in the allowable OC emissions limits.
- P0115596 issued on 6-10-2014 for emissions units P010, P011, P017, P018, P020, P021, P022 and P026: administrative modification for use of more representative factor for estimating VOC, OC & HAP emissions with no process change and an increase in the allowable OC emissions limits.

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. NA

B. Facility-Wide Terms and Conditions

Term & Condition	Basis		Comments
	SIP (3745-)	Other	
1.	None.	None.	No rules in section B. which are state enforceable only.
2.	77-07(C)(1)		Electronic reporting to assure federal enforceability.
3.		40 CFR 63.4480 - 63.4581;	Identification of subject EUs and citation of rule.



		Table 2, 40 CFR Part 63, Subpart PPPP	
4.		40 CFR 63.5780 – 63.5935; Table 15, 40 CFR Part 63, Subpart WWWW	Identification of subject EUs and citation of rule.
5.		40 CFR 63.6(b)(2), 40 CFR 63.7485, 40 CFR 63.7490, and 40 CFR 63.7495	Citation of general MACT requirement and 40 CFR Part 63, Subpart DDDDD, NESHAP for industrial, commercial, and institutional boilers located at a major source of HAPs.
6.		40 CFR Part 63, Subpart DDDDD	Requirements of 40 CFR Part 63, Subpart DDDDD are cited in this permit.
7.		40 CFR 63.7500(e), 40 CFR 63.7540(a)(10) through (13), and Table 10 to 40 CFR Part 63, Subpart DDDDD	Identification of subject EUs and specific requirement(s) reference.
8.a.	21-25(D) & 77-07(C)(1)		Fed. enf. work practice requirements to all subject composite plastic mfg. facilities; calculation method citation for the VOC emissions threshold and VOC emissions reduction requirement to determine if actual facility-wide emissions are ≥ 100 TPY VOC; and control efficiency requirements for SMC manufacturing machines if actual SMC emissions are ≥ 25 TPY VOC.
8.b.(1)	21-25(P)(1) & 77-07(C)(1)		Federal enforceable notification requirements.
8.b.(2)	21-25(P)(4) & 77-07(C)(1)		Federal enforceable records retention requirements.
8.c.(1)	21-25(Q)(1) & 77-07(C)(1)		Federal enforceable semi-annual compliance status reporting requirements.



8.c.(1)	21-25(Q)(2) & 77- 07(C)(1), last paragraph	Federal enforceable semi-annual compliance status reporting requirements or follow reporting periods established in the Title V permit.
8.c.(2)	21-25(Q)(4) & 77- 07(C)(1)	Federal enforceable reporting/notification requirement if VOC emissions > 100 TPY which subjects EUs to additional requirements in OAC rule 3745-21-25(D)(3).
8.c.(3)	21-25(S)(1) & 77- 07(A)(3)	Initial notification (reporting) requirements.
8.d.	21-25(R)(1) & 77- 07(C)(1)	Federal enforceable compliance deadline.
8.e.(1)	21-25(F)(1) & 77- 07(C)(1)	Identification of operations to be included in federal enforceable VOC emissions threshold determination.
8.e.(2)	21-25(F)(3) & 77- 07(C)(1)	Identification of calculation methods for the federal enforceable VOC emissions threshold determination.
8.e.(3)	21-25(F)(4) & 77- 07(C)(1)	Identification of the first applicable time period for the fed. Enf. VOC emissions threshold determination.
8.e.(4)	21-25(F)(5) & 77- 07(C)(1)	Identification of subsequent applicable time period(s) for the federal enforceable VOC emissions threshold determination.



C. Emissions Unit Terms and Conditions

<p>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?</p>	<p>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</p>
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EU(s)	Limitation	Basis		N	O	M	EN	F	R	R	E	S	Misc	Comments
		SIP (3745-)	Other											
K001	No VE from stack(s) serving the water dry off oven & the coating dry off oven during any 30-min. observation period	31-05 (A)(3)		N	Y	N	N		Y	Y	N	N	N	OR = c)(1) shall burn only natural gas in the water dry off oven & in the coating dry off oven. R = d)(2) for each day during which the permittee burns a fuel other than natural gas, the permittee shall



													that provide: an identification of each day when a fuel other than natural gas was burned in the water dry off oven or in the paint dry off oven.
K001	0.25 lb NO _x /hr from each dry off oven; and 2.19 NO _x tons/yr from the dry off ovens combined	31-05 (A)(3)		N	Y	N	N	Y	Y	N	N	N	<p>OR = c)(1) shall burn only natural gas in the water dry off oven & in the coating dry off oven.</p> <p>R = d)(2) for each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned.</p> <p>Rp = e)(2)a. Qtrly dev. Rpts that provide: an identification of each day when a</p>



													burned in the water dry off oven or in the paint dry off oven.
K001	Visible PE shall not exceed 0% opacity, as a 6-min. ave. from the stack serving the coating operation	31-05 (A)(3)		N	Y	N	N	Y	Y	N	N	N	OR = c)(2) operate the dry filtration system for the control of PE whenever this EU 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 R = d)(3) maintain records that document any time periods when the dry



													made by the permittee) when the emissions unit was in operation.
K001	0.021 lb PE/hr from the stack serving coating operation	31-05 (A)(3)		N	Y	N	N	Y	Y	N	N	N	OR = c)(2) operate the dry filtration system for the control of PE whenever this EU 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 R = d)(3) maintain records that document any time periods when the dry



													made by the permittee) when the emissions unit was in operation.
K001	0.26 ton PE/yr from all operations.	31-05 (A)(3)		N	Y	N	N	Y	N	N	N	N	OR = c)(1) shall burn only natural gas in the water dry off oven & in the coating dry off oven; and c)(2) operate the dry filtration system for the control of PE whenever this EU 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



													f)(2)j. – calculation method may be used to estimate annual PE rate.
K001	621 lbs OC/day from coating operation.	31-05 (A)(3)		N	N	N	N	Y	Y	N	N	N	R = d)(4)f. – daily record of total OC emission rate for all coatings materials, in pounds per day. Rp = e)(2)c. – qtrlyrpt of each day during which the daily OC emissions from the coatings operation exceeded 621 lbs/day, and the actual daily OC emissions for each such day.
K001	1741 lbs OC/month from the cleanup/purge operation.	31-05 (A)(3)		N	N	N	N	Y	Y	N	N	N	R = d)(5)f. – monthly record of OC emissions from cleanup materials in pounds per month.



													month during which the rolling, 12-month VOC emissions from the coatings operation and the cleanup/purge operation, combined, exceeded 29.7 tons, and the actual rolling, 12-month VOC emissions for each such month.
K001	Organic HAP emissions shall be limited to no more than the limit specified; e.g. 0.16 lb organic HAP/lb coating solids used during each 12-month compliance period for each general use ctg op.	31-05 (A)(3) – c)(3) op. restriction	40 CFR 63.4490(a)(1) through (4)	N	Y	N	N	Y	Y	N	N	N	Additional related requirements: b)(2)a. 40 CFR 63.4491(a) - (b) - must include all coatings (as defined in 40 CFR 63.4581), thinners and/or other additives, and cleaning materials used in this emissions unit when



													record keeping requirements required under 40 CFR Part 63, Subpart WWWW ... Rp – e)(5) – ... comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW ...
P001	General MACT requirements		40 CFR 63.1 - 63.15	N	N	N	N	N	N	N	N	N	b)(1)e. - General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.
P012	Work practice stds	21-25	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	N	Y	N	Y	Y	N	N	N	N	OR = c)(1) – Work practices for closed molding machines R = d)(2) daily log of work practices employment.



P025	1.49 lbs OC/hr, 35.8 lbs OC/day production ops; 261.1 lbs OC/wk cleanup/purge ops; and 13.3 tons OC/yr production & cleanup/purge ops, combined	31-05 (A)(3)		N	Y	N	N	Y	Y	N	N	N	OR = c)(1) - use of materials containing VOCs is prohibited in cleanup/purge operations; R = d)(4) daily records of daily & hourly OC emissions – production; d)(5) weekly records of wkly OC emissions – cleanup/purge; Rp = e)(3) qtrlyrpt of OC emissions limit devs and use of cleanup mtl containing any VOC; f)(2)d. through g. – calculations to estimate OC emissions.
P025	less stringent than limits per -31- 05(A)(3)	17-07(A)		N	N	N	N	Y	Y	N	N	N	R = d)(2) – weekly observation of stack & log; Rp = e)(2) semi- annual rpt if VE



														observed & corrective action.
P025	less stringent than limits per -31-05(A)(3)	17-11(B)		N	N	Y	N	Y	Y	N	N	N		b)(2)a. - shall be vented to a baghouse at all times EU operates M = d)(3) - continuously monitor the pressure drop on baghouse R = d)(3) - daily record of baghouse pres. drop Rp = e)(3)a. through e. qtrly rpt baghouse press drop outside of range; periods when op but not vented to baghouse; and deviations of record keeping re. corrective actions. f)(2)b. - calculation to estimate hourly PE rate; testing if



														required.
P025	85% ctrl VOC or 90% ctrl VOC w incinerator	21-07(M) and (M)(2)		Y	N	N	N	N	N	N	N	N	N	b)(1)b. – EU is not equipped with OC emissions control equipment. Per - 21-07(M)(3), this EU is not subject to the requirements of OAC rule 3745-21-07(M)(2).
P025	Work practice stds	21-25(D)(1)	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	N	Y	N	Y	Y	N	N	N	N	N	OR = c)(2) - mixing operations work practices: use mixer covers; close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials ..; and Keep the mixer covers closed while actual mixing is occurring... R = d)(6) daily



													log of work practices employment. Rp = e)(4) – semi-annual rpt work practice devs.
P025	General MACT requirements		40 CFR 63.1 - 63.15	N	N	N	N	N	N	N	N	N	b)(1)g. - General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.
P027	7.78 lbs OC/hr production ops	31-05 (A)(3)		N	N	N	N	Y	Y	N	N	N	R = d)(2) – ave. hourly OC emissions from production. Rp = e)(2) - Qtrlydevrpt of identification of each day during which hourly OC emissions from production exceeded limit, and the actual hourly OC emissions for each such day.



P027	261.1 lbs OC/week from cleanup/purge operations	31-05 (A)(3)		N	Y	N	N	Y	Y	N	N	N	OR = c)(2) The use of materials containing VOCs is prohibited in cleanup/purge operations. R = d)(5) - OC emissions from cleanup materials in pounds per week. Rp = e)(2) - Qtrlydevrpt of identification of each week during which the weekly OC emissions from the use of cleanup/purge materials exceeded the limit, and the actual weekly OC emissions for each such wk.
P027	18.0 tons OC/yr production & cleanup/purge ops, combined	31-05 (A)(3)		N	Y	N	N	Y	N	N	N	N	OR = c)(1) - work practice stds; and c)(2)The use of materials



	requirements		63.1 - 63.15											
														Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.
P028	5% opacity VE, 6-min. ave.	31-05 (A)(3)		N	N	N	N	Y	Y	N	N	N		R = d)(2) – weekly observation of stack & log; Rp = e)(2) semi-annual rpt if VE observed & corrective action.
P028	0.52 lb PE/hr& 2.28 PE tons/yr	31-05 (A)(3)		N	N	Y	N	Y	Y	N	N	N		b)(2)a. - shall be vented to a baghouse at all times EU operates M = d)(3) - continuously monitor the pressure drop on baghouse R = d)(3) – daily record of baghouse pres. drop Rp =e)(3) qtrlyrptbaghouse press drop



													outside of range; periods when op but not vented to baghouse; and deviations of record keeping re. corrective actions. f)(2)b. – calculation to estimate hourly PE rate; testing if required. f)(2)c. – calculation to estimate annual PE rate.
P028	7.94 lbs OC/hr, 261.1 lbs OC/wk cleanup/purge ops; and 13.3 tons OC/yr production & cleanup/purge ops, combined	31-05 (A)(3)		N	Y	N	N	Y	Y	N	N	N	OR = c)(1) - use of materials containing VOCs is prohibited in cleanup/purge operations; R = d)(4) daily records of daily & hourly OC emissions – production; d)(5) weekly records of wkly OC emissions – cleanup/purge;



													required.
P028	85% ctrl VOC or 90% ctrl VOC w incinerator	21-07(M) and (M)(2)		Y	N	N	N	N	N	N	N	N	b)(1)b. – EU is not equipped with OC emissions control equipment. Per - 21-07(M)(3), this EU is not subject to the requirements of OAC rule 3745-21-07(M)(2).
P028	Work practice stds	21-25(D)(1)	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	N	Y	N	Y	Y	N	N	N	N	OR = c)(2) - mixing operations work practices: use mixer covers; close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials ..; and Keep the mixer covers closed while actual mixing is occurring... R = d)(6) daily



													log of work practices employment. Rp = e)(4) – semi-annual rpt work practice devs.
P028	General MACT requirements		40 CFR 63.1 - 63.15	N	N	N	N	N	N	N	N	N	b)(1)h. - General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.
P010,P011,P017,P018,P020,P021, & P026	OC emissions limits – lbs/hr, lbs/day & tons/yr	-31-05(A)(3)		N	N	N	Y	Y	N	N	N	N	R = d)(2) daily records of hourly & daily OC emissions. Rp = e)(2) qtrlyrpt of dev w hourly & daily OC emissions limits. f)(2)a. calc. methods to determine OC emissions.
P010,P011,P017,P018,P020,P021, & P026	Work practice stds	21-25	40 CFR Part 63, Subpart WWWW	N	Y	N	Y	Y	N	N	N	N	OR = c)(1) – Work practices for closed



													WWWW.
P022, P023 & P024	OC emissions limits – lbs/hr& tons/yr	-31-05(A)(3)		N	N	N	Y	Y	N	N	N	N	R = d)(2) daily records of hourly OC emissions. Rp = e)(2) qtrlyrpt of dev w hourly OC emissions limits. f)(2)a. calc. methods to determine OC emissions.
P022, P023 & P024	Work practice stds	21-25	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	N	Y	N	Y	Y	N	N	N	N	OR = c)(3) – Work practices for closed molding machines R = d)(3) daily log of work practices employment. Rp = e)(3) – semi-annual rpt work practice devs for 21-25 & 40 CFR Part 63, Subpart WWWW; and e)(4) for 40 CFR Part 63, Subpart WWWW.



P022, P023 & P024	Exemption to -21-07 requirements	21-25(A)(3)		N	N	N	N	N	N	N	N	N	Not required to meet the requirements of OAC rule 3745-21-07 if achieving compliance with OAC rule 3745-21-25.
P022, P023 & P024		General MACT requirements	40 CFR 63.1 - 63.15	N	N	N	N	N	N	N	N	N	b)(1)f. - General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.
P030, P031, P032, P033 & P034	OC emissions limits – lbs/hr& tons/yr	-31-05(A)(3)		N	N	N	Y	Y	N	N	N	N	R = d)(2) daily records of hourly OC emissions. Rp = e)(2) qtrly rpt of dev w hourly OC emissions limits. f)(2)a. calc. methods to determine OC emissions.
P030, P031, P032, P033 & P034	Work practice stds	21-25	40 CFR Part 63, Subpart WWWW	N	Y	N	Y	Y	N	N	N	N	OR = c)(1) – Work practices for closed



DRAFT

**Division of Air Pollution Control
Title V Permit
for**

Continental Structural Plastics of Ohio LLC aka CSP OH

Facility ID:	0204020245
Permit Number:	P0084209
Permit Type:	Renewal
Issued:	7/16/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Continental Structural Plastics of Ohio LLC aka CSP OH

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Draft Title V Permit
Continental Structural Plastics of Ohio LLC aka CSP OH
Permit Number: P0084209
Facility ID: 0204020245
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0204020245
Facility Description: Reinforced plastic composite parts manufacturing and painting
Application Number(s): A0014744, A0014745, A0014746, A0014747, A0014748, A0014749, A0014750
Permit Number: P0084209
Permit Description: Renewal Title V Operating Permit
Permit Type: Renewal
Issue Date: 7/16/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0084208

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Continental Structural Plastics of Ohio LLC aka CSP OH
Permit Number: P0084209
Facility ID: 0204020245
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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



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

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

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

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

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

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

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



Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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



federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control



system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.



- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

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

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



9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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



12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:



- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
- (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

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

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in



response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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



18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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



Unless otherwise exempted, 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 Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original



strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

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

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

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

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

28. Permit Transfers

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

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

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

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

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



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

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
Continental Structural Plastics of Ohio LLC aka CSP OH
Permit Number: P0084209
Facility ID: 0204020245
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

3. The following emissions units, as well as all storage containers and mixing vessels in which coating, thinners and/or other additives, and cleaning materials are stored or mixed, all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials, and all storage container and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The complete Maximum Achievable Control Technology (MACT) requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.

EU ID	Operations, Property and/or Equipment Description
K001	Paint line 1 - coating line for plastic parts.
P042	Misc. assembly - adhesive bonding.
P044	Paint kitchen - paint stirring in closed drums.

2. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart PPPP. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart PPPP and Subpart A.

[Authority for term: 40 CFR 63.4480 - 63.4581 and Table 2 of 40 CFR Part 63, Subpart PPPP]

4. The following emissions units, as well as cleaning of equipment used in reinforced plastic composites manufacture, volatile organic compound-containing (VOC-containing) materials storage, and repair operations on reinforced plastic composites parts that are manufactured at the facility contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.

EU ID	Operations, Property and/or Equipment Description
P001	24 inch sheet mold compound (SMC) machine no. 1.
P010	Compression mold press no. 6 for reinforced plastic composite.
P011	Compression mold press no. 7 for reinforced plastic composite parts.
P012	Compression mold press no. 8 for reinforced plastic composite parts.
P017	Injection mold press no. 13 with a slitter for reinforced plastic composite parts.
P018	Injection mold press no. 14 with a slitter system for reinforced plastic composite parts.



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

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 15 of 40 CFR Part 63, Subpart WWWW. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart WWWW, and Subpart A.

[Authority for term: 40 CFR 63.5780 – 63.5935 and Table 15 of 40 CFR Part 63, Subpart WWWW]

5. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this

NESHAP for the facility's new (commenced construction after 6/4/2010) boilers by January 31, 2013, or upon startup, whichever is later; and the facility's existing boilers shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016.



[Authority for term: 40 CFR 63.6(b)(2), 40 CFR 63.7485, 40 CFR 63.7490 and 40 CFR 63.7495]

6. The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility’s boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575.

[Authority for term: 40 CFR Part 63, Subpart DDDDD]

7. The following boiler(s) are designed to only burn gas 1 fuels (subcategory) and therefore are not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler(s) are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 of the subpart:

EU ID	Operations, Property and/or Equipment Description
B001	7.5 mmBtu/hr. natural gas & oil fired Cleaver Brooks boiler no. 1
B002	2.8 mmBtu/hr. natural gas & oil fired Johnson heater no. 1
B005	7.5 mmBtu/hr. natural gas & oil fired Cleaver Brooks boiler no. 2

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee shall meet the applicable requirements of the General Provision in Part 63 Subpart A as identified in Table 10 to the subpart.

[Authority for term: 40 CFR 63.7500(e) and 40 CFR 63.7540(a)(10) through (13) and Table 10 to 40 CFR Part 63, Subpart DDDDD]

8. Requirements of OAC rule 3745-21-25:
- a) VOC control requirements:
- (1) The permittee shall meet the requirements of OAC rule 3745-21-25 including the work practice standards in Table 1 of OAC rule 3745-21-25.
 - (2) If the facility has VOC emissions less than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall meet the VOC emissions limits in Table 2 of OAC rule 3745-21-25. The facility’s VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.8.e).
 - (3) If the facility has VOC emissions equal to or greater than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall reduce the total VOC emissions from these operations by at least ninety-five percent (95%) by weight. As an alternative to meeting 95% by weight reduction, the permittee may meet the VOC emissions limits in Table 3 of



OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.8.e).

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

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

- (5) Except where exempted under paragraph (D)(9) of OAC rule 3745-21-25, any owner or operator of a SMC manufacturing machine shall install and operate a VOC emission control system that reduces the VOC emissions from the SMC manufacturing machine by at least 95%, by weight (i.e., an overall control efficiency of at least 95%, by weight).
- (6) Exempted from the requirement of paragraph (D)(8) of OAC rule 3745-21-25, as cited in sections C.2.b)(2)b and C.5.b)(2)b, is any uncontrolled SMC manufacturing machine with VOC emissions of less than 25.0 tons per rolling, 12-month period.
- (7) If an add-on control device is used to comply with this rule, such add-on control device shall meet all the requirements contained in 40 CFR Part 63, Subpart SS. The owner or operator shall also establish each control device operating limit in 40 CFR Part 63, Subpart SS, that applies.

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

b) Recordkeeping Requirements:

- (1) In accordance with OAC rule 3745-21-25(P)(1), the permittee shall keep the following records:
 - a. a copy of each applicability notification and compliance status report submitted to comply with this rule, including all documentation supporting any applicability or compliance status; and
 - b. a certified statement that operations are in compliance with the work practice standards specified in Table 1 of the rule, as applicable.

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

- (2) In accordance with OAC rule 3745-21-25(P)(4), all records specified in section B.8.b)(1) shall be retained by the owner or operator for a period of not less than five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(C)(1)]

c) Reporting Requirements:

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



- a. Company name and address;
- b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. Date of the report and beginning and ending dates of the reporting period;
- d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in Table 1 of the OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;
- e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs at an affected operation where a continuous monitoring system (CMS) is not used to comply with the VOC emissions limitation, operating, or work practice standard in OAC rule 3745-21-25, the compliance report shall contain the following information:
 - i. The total operating time of each following operation during the reporting period:
 - (a) Open molding;
 - (b) Compression/injection molding;
 - (c) Centrifugal casting;
 - (d) Continuous lamination;
 - (e) Continuous casting;
 - (f) Polymer casting;
 - (g) Pultrusion;
 - (h) SMC manufacturing;
 - (i) BMC manufacturing;
 - (j) Mixing;
 - (k) Cleaning of equipment used in reinforced plastic composites manufacture;
 - (l) VOC-containing materials storage; and
 - (m) Repair operations on reinforced plastic composites parts that are manufactured at the facility.



- ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action(s) taken; and
- f. Where multiple compliance options are available, the permittee shall state in this compliance report if the permittee has changed compliance options since the last compliance report.

The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each 6-month period to the Ohio EPA Northeast District Office. Each compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

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

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

[Authority for term: OAC rule 3745-21-25(Q)(2) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-21-25(Q)(4) and OAC rule 3745-77-07(C)(1)]

- (3) In accordance with OAC rule 3745-21-25(S)(1), the permittee of an affected operation, as specified in OAC rule 3745-21-25(C), shall notify the Ohio EPA Northeast District Office in writing that such operation is subject to OAC rule 3745-21-25. The notification, which shall be submitted no later than sixty days after December 14, 2009, shall provide the information specified in OAC rule 3745-21-25(S)(1). The initial notification of applicability with OAC rule 3745-21-25 was received on October 27, 2010.

[Authority for term: OAC rule 3745-21-25(S)(1) and OAC rule 3745-77-07(A)(3)]

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

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

- e) Calculation of facility's VOC emissions threshold
 - (1) In accordance with OAC rule 3745-21-25(F)(1), to calculate the facility's VOC emissions threshold in tons per year for purposes of determining which requirements apply under OAC rule 3745-21-25(D), the permittee shall use the procedures in section B.8.e)(2). A facility's VOC emissions threshold pertains to the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing,



mixing, and BMC manufacturing. For the facility's VOC emissions threshold, calculate VOC emissions prior to any add-on control device, and do not include VOC emissions from any resin or gel coat used in operations subject to the boat manufacturing NESHAP, 40 CFR Part 63, Subpart VVVV, or from the manufacture of large parts as defined in OAC rule 3745-21-25(D)(4).

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

- (2) In accordance with OAC rule 3745-21-25(F)(3), the permittee may use the procedures in either section B.8.e)(2)a. or section B.8.e)(2)b. for the operations specified in section B.4. If the emission factors for this facility have changed over the period of time prior to its initial compliance date due to incorporation of pollution-prevention control techniques, the facility may base the average emission factor on its operations as they exist on the compliance date. If the facility has accepted an enforceable permit limit that would result in less than one hundred tons per year (per rolling, 12-month period) of VOC measured prior to any add-on controls, and can demonstrate that it will operate at that level subsequent to the compliance date, it can be deemed to be below the one hundred tons per year threshold.

- a. Use a calculated emission factor

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

- b. Conduct performance testing

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

[Authority for term: OAC rule 3745-21-25(F)(3) and OAC rule 3745-77-07(C)(1)]



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

[Authority for term: OAC rule 3745-21-25 (F)(4) and OAC rule 3745-77-07(C)(1)]

- (4) In accordance with OAC rule 3745-21-25(F)(5), after the initial compliance date, the facility shall calculate VOC emissions over the 12-month period ending June thirtieth or December thirty-first, whichever date is the first date following the compliance date specified in section B.8.d). Subsequent calculations should cover the periods in the semiannual compliance reports.

[Authority for term: OAC rule 3745-21-25(F)(5) and OAC rule 3745-77-07(C)(1)]



Draft Title V Permit
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C. Emissions Unit Terms and Conditions



1. K001, Paint Line 1

Operations, Property and/or Equipment Description:

2.5 mmBTU/hr. natural gas-fired water dry off oven, two plastic parts coating spray booths, and a 2.5 mmBTU/hr. natural gas-fired coating dry off oven.

- 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 02-19379, issued on December 28, 2004, for emissions unit K001	<p>There shall be no visible particulate emissions (PE) from the stack(s) serving the water dry off oven and the coating dry off oven during any 30-minute observation period.</p> <p>PE shall not exceed 0.0057 lb/hr from each dry off oven.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.206 lb/hr from each dry off oven.</p> <p>CO emissions shall not exceed 1.81 tons/yr from the dry off ovens, combined.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 0.25 lb/hr from each dry off oven.</p> <p>NO_x emissions shall not exceed 2.19 tons/yr from the dry off ovens, combined.</p> <p>Organic compound (OC) emissions shall not exceed 0.027 lb/hr from the natural gas fuel combustion at each dry off oven. See c)(1).</p> <p>Visible PE from the stack serving the coating operation shall not exceed 0% opacity as a 6-minute average.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>PE shall not exceed 0.21 lb/hr from the stack serving the coating operation.</p> <p>OC emissions shall not exceed 621 lbs/day from the coating operation.</p> <p>OC emissions shall not exceed 1741 lbs/month from the cleanup/purge operation.</p> <p>The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D)(1)(a) and 40 CFR Part 63, Subpart PPPP.</p> <p>See c)(2), c)(3), d)(2) and e)(1)a.</p> <p>PE shall not exceed 0.97 ton/yr from all operations.</p> <p>OC emissions shall not exceed 30.0 tons/yr from all operations.</p>
b.	OAC rule 3745-31-05(D)(1)(a) – voluntary restriction to limit volatile organic compound (VOC) and to avoid the Lowest Achievable Emissions Rate (LAER) Offset requirements.	The VOC emissions shall not exceed 29.7 tons, based upon a rolling, 12-month summation of the emissions from the coating and cleanup/purge operations, combined.
c.	OAC rule 3745-17-11(C)	The requirements specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581]	<p>In accordance with 40 CFR 63.4490(a)(1) through (4), organic hazardous air pollutant (HAP) emissions shall be limited to no more than the limit specified; e.g. 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation.</p> <p>See b)(2)a and b)(2)b.</p>
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart PPPP.

(2) Additional Terms and Conditions

- a. The permittee must include all coatings (as defined in 40 CFR 63.4581), thinners and/or other additives, and cleaning materials used in this emissions unit when



determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in b)(1)d. To make this determination, the permittee must use at least one of the following compliance operations. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operations. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by 40 CFR 63.4530(c), the permittee must report it in the next semiannual compliance report required in 40 CFR 63.4520.

i. Compliant material option:

Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in section b)(1)d., and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, 63.4541 and 63.4542 to demonstrate compliance with the applicable emission limit using this option.

or

ii. Emission rate without add-on controls options.

Demonstrate that, based on the coatings, thinners and/or, other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emissions limit in b)(1)d, calculated as a rolling, 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.4550, 63.4551 and 63.4552 to demonstrate compliance with the emission limit using this option.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR 63.4491(a) - (b) and PTI 02-19379]

b. The permittee must be in compliance with the emission limitations in b)(1)d at all times.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.4500(a)(1)]



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in the water dry off oven and in the coating dry off oven.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19379]

- (2) 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.

[Authority for term: OAC rule 3745-17-11(C)(1), OAC rule 3745-77-07(C)(1) and PTI 02-19379]

- (3) The use of cleanup/purge materials, containing HAP, is prohibited.

[Authority for term: PTI 02-197379, 40 CFR 63.4491(a) – compliant material option, OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in the water dry off oven and in the coating dry off oven.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19379]

- (2) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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.

[Authority for term: OAC rule 3745-17-11(C)(1) and PTI 02-19379]

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

- a. the company identification for each coating material employed;
- b. an identification of the coating operations classification (e.g. general use operation, automotive lamp operation, thermoplastic olefin (TPO) operation or assembled on-road vehicle operation) for each coating material employed;
- c. the volume of each coating material employed, in gallons per day;
- d. the total OC content and the VOC content of each coating, in pounds per gallon;
- e. the organic HAP content of each coating, in lb of HAP per lb of solids; and



- f. the total OC emission rate for all coatings materials, in pounds per day, calculated as specified:

$$E_p = \sum_{i=1}^n [(VP)(OC)]_i$$

where:

E_p = total OC emissions from all coating materials, in pounds per day;

VP = volume of each coating material, in gallons, as recorded in d)(3)c;

OC = OC content of each coating material, in pounds per gallon, as recorded in d)(3)d;

i = subscript denoting an individual coating material;

n = the total number of different coating materials; and

- g. the total VOC emissions rate for all coating materials, in pounds per day, which may be calculated as specified in d)(3)f., except that the VOC content is employed instead of the OC content. Equivalent, alternative method(s), as approved by Ohio EPA may be employed.

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

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

- a. the company identification of each cleanup material employed;
- b. the volume of each cleanup material employed, in gallons;
- c. the total OC content, the VOC content and the organic HAP content of each cleanup material, in pounds per gallon;
- d. the volume of each waste cleanup material collected for reuse or disposal in gallons;
- e. the volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “b” – “d”, in gallons;
- f. the OC emissions from cleanup materials in pounds per month, calculated as specified:

$$E_c = \sum_{j=1}^m [(VC)(OCc)]_j$$

where:

E_c = monthly OC emissions from cleanup materials, in pounds per month;



VC = volume of each evaporated cleanup material, in gallons, as recorded in d)(5)e;

OC_c = OC content of each cleanup material, in pounds per gallon, as recorded in d)(4)c;

j = subscript denoting an individual cleanup material;

m = the total number of different cleanup materials; and

- g. the total VOC emissions rate for all cleanup/purge materials, in pounds per month, which may be calculated as specified in d)(4)f, except that the VOC content is employed instead of the OC content. Equivalent, alternative method(s), as approved by Ohio EPA may be employed.

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

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

- a. the VOC emissions from the coatings operation and the cleanup/purge operation, combined, for each month, in tons, calculated as specified:

$$\text{VOC(Month)} = \{ \sum_{i=1}^n [EP]_i + EC \} \times \text{ton OC}/2000 \text{ lbs. OC.}$$

where:

EP = the VOC emissions from all coating materials, in pounds per day, as recorded in d)(3)g;

i = subscript denoting individual daily emissions from coating materials;

n = the total number of days of coating materials usage;

EC = the VOC emissions from cleanup/purge materials, in pounds per month, as recorded in d)(4)g; and

- b. the rolling, 12-month summation of the VOC emissions from the coatings operation and the cleanup/purge operation, combined, in tons.

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

- (6) The permittee shall collect and record each month for this emissions unit the information required under 40 CFR Part 63, Subpart PPPP, including sections 63.4530 and 63.4531.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4530 and 63.4531]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. an identification of each day when a fuel other than natural gas was burned in the water dry off oven or in the coating dry off oven;
 - b. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation;
 - c. an identification of each day during which the daily OC emissions from the coatings operation exceeded 621 lbs/day, and the actual daily OC emissions for each such day;
 - d. an identification of each month during which the monthly OC emissions from the use of cleanup/purge materials exceeded 1741 lbs/month, and the actual monthly OC emissions for each such month;
 - e. an identification of each month during which the rolling, 12-month VOC emissions from the coatings operation and the cleanup/purge operation, combined, exceeded 29.7 tons, and the actual rolling, 12-month VOC emissions for each such month; and
 - f. an identification of each day during which any cleanup/purge materials with a HAP content were employed.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart PPPP, including sections 63.4510 and 63.4520.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4510 and 63.4520]

f) Testing Requirements

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

a. Emission Limitation:

There shall be no visible PE from the stack(s) serving the water dry off oven and the coating dry off oven during any 30-minute observation period.



Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

b. Emission Limitation:

Visible PE from the stack serving the coating operation shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

c. Emission Limitations:

PE shall not exceed 0.0057 lb/hr from each dry off oven.

CO emissions shall not exceed 0.206 lb/hr from each dry off oven.

NO_x emissions shall not exceed 0.25 lb/hr from each dry off oven.

OC emissions shall not exceed 0.027 lb/hr from the natural gas fuel combustion at each dry off oven.

Applicable Compliance Method:

To determine the worst case emission rate the following equation may be used:

$$E_i_D01 = E_i_O1 = \text{mmBtu/hr} \times EF_i$$

where:

$E_i_D01 = E_i_O1$ = the emissions rate from the water dry off oven or the coating dry off oven, in pounds per hour;

mmBtu/hr = the maximum rated heat input capacity, which is 2.5 million Btu per hour for each natural gas fired dry off oven, as noted in the permit application; and

EF_i = the emissions factor for pollutant i , which is as follows, assuming an average natural gas fuel heat value of 1,020 Btu per standard cubic foot:

0.0019 lb PE/mmBtu, derived from AP-42, Table 1.4-2, chapter 1.4 (7/98);

0.0824 lb CO/mmBtu, derived from AP-42, Table 1.4-1, chapter 1.4 (7/98);

0.098 lb NO_x/mmBtu, derived from AP-42, Table 1.4-1, chapter 1.4 (7/98); and



0.0108 lb OC/mmBtu, derived from AP-42, Table 1.4-2, chapter 1.4 (7/98).

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with these emission limitations through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 5, 10, 7E and 25, for the PE rate, CO, NO_x and OC emissions, respectively. Equivalent, alternative method(s), as approved by Ohio EPA, may be performed.

d. Emission Limitations:

CO emissions shall not exceed 1.81 tons/yr from the dry off ovens, combined.

NO_x emissions shall not exceed 2.19 tons/yr from the dry off ovens, combined.

Applicable Compliance Method:

Compliance may be based on the determination of the maximum, controlled, annual emissions by the following equation:

$$E_i(\text{YR}) = E_i(\text{HR}) \times \text{Hrs/yr} \times \text{ton } E_i / 2000 \text{ lbs } E_i$$

where:

$E_i(\text{YR})$ = the maximum, annual emissions rate, in tons/yr, for pollutant "i", in tons/yr;

$E_i(\text{HR}) = E_{i_D01} = E_{i_O1}$ = maximum, hourly controlled pollutant emissions, in lbs/hr, as specified in f)(1)c; and

Hrs/yr = the maximum annual operating hours, which is 8,760 hrs/yr.

e. Emission Limitation:

PE shall not exceed 0.21 lb/hr from the stack serving the coating operation.

Applicable Compliance Method:

To determine the actual emission rate the following equation may be used:

$$E_{\text{PE}} = V_i \times D_i \times \text{Solids Ratio}_i \times EF_{\text{PE}} \times (1 - CP) \times (1 - CE)$$

where:

E_{PE} = PE rate from the coating operation, in pounds per hour;

V_i = the volume of coating "i" employed, in gallons per day;

D_i = density of coating "i" employed, in lbs. per gallon;

Solids Ratio_i = solids content of coating "i", in pound of available solids per pound of coating;



EF_PE = emission factor for uncontrolled PE, which is 0.50 pounds of uncontrolled PE per pound of available solids, i.e. a 50% transfer efficiency for air atomized high volume low pressure spray guns as noted in Chapter 10, Air Pollution Engineering Manual, 1992;

CP = capture efficiency of the coating booth, which is 1.0 lb PE captured per lb uncontrolled PE as noted in the permit application; and

CE = control efficiency of the PE control device, a paper filter, which is 0.99 lb PE controlled/lb uncontrolled PE as noted in the permit application.

If required, pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with these emission limitations through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 5 for the PE rate. Equivalent, alternative method(s), as approved by Ohio EPA, may be performed.

f. Emission Limitation:

OC emissions shall not exceed 621 lbs/day from the coating operation.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(3)f.

g. Emission Limitation:

OC emissions shall not exceed 1741 lbs/month from the cleanup/purge operation.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(4)f.

h. Emission Limitation:

The VOC emissions shall not exceed 29.7 tons, based upon a rolling, 12-month summation of the emissions from the coating and cleanup/purge operations, combined.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(5)b.

i. Emission Limitation:

In accordance with 40 CFR 63.4490(a)(1) through (4), organic hazardous air pollutant (HAP) emissions shall be limited to no more than the limit specified; e.g.



0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3)e and d)(6).

j. Emission Limitation:

PE shall not exceed 0.97 ton/yr from all operations.

Applicable Compliance Method:

To determine the worst case emission rates the following equation may be used:

$$E_{PE_TOTAL} = E_{PE_OVENS}(YR) + (E_{PE_COATING} \times 8760 \text{ hrs/yr} \times \text{ton PE}/2000 \text{ lbs PE})$$

where:

E_{PE_TOTAL} = the PE rate from the dry off ovens and the coatings operation, in tons/yr;

$E_{PE_OVENS}(YR)$ = the PE rate from the dry off ovens, in tons/yr, as specified in f)(1)d; and

$E_{PE_COATING}$ = the PE rate from the coatings operation, in lbs/hr, as specified in f)(1)e.

k. Emission Limitation:

OC emissions shall not exceed 30.0 tons/yr from all operations.

Applicable Compliance Method:

To determine the actual emission rates the following equation may be used:

$$E_{OC_TOTAL} = E_{OC_OVENS}(YR) + [(\sum_{i=1}^n EP_i) + (\sum_{j=1}^m EC_j) \times \text{ton OC}/2000 \text{ lbs OC}]$$

where:

E_{OC_TOTAL} = the OC rate from the dry off ovens, the coatings operation and the cleanup/purge operation, in tons/yr;

$E_{OC_OVENS}(YR)$ = the OC rate from the dry off ovens, in tons/yr, as specified in f)(1)d;

EP = the OC emissions from all coating materials, in pounds per day, as specified in d)(3)f;

i = subscript denoting an individual day's emissions from the coatings operation;



n = the total number of days of coatings operation;

EC = the monthly OC emissions from cleanup/purge materials, in pounds per month;

j = subscript denoting an individual month's emissions from the cleanup/purge operation; and

m = the total number of months of cleanup/purge operation.

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

g) Miscellaneous Requirements

(1) None.



2. P001, SMC Line 1 (24")

Operations, Property and/or Equipment Description:

24 inch sheet mold compound (SMC) machine no. 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) PTI 02-18224, issued on April 12, 2005 for emissions unit P001	The organic compound (OC) emissions shall not exceed 261.1 lbs/week from cleanup/purge operations and 14.09 tons/year from production and cleanup/purge operations, combined. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW. See c)(1) and c)(2).
b.	OAC rule 3745-21-07(M)(3)(g)	See b)(2)a.
c.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See b)(2)b and c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-21-07(M)(5)(h), the provisions of paragraph (M)(3)(g) of OAC rule 3745-21-07 shall not apply to this emissions unit, when complying with all work practice standards as specified in c)(1).

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

- b. In accordance with OAC rule 3745-21-25(D)(9), this emissions unit is exempt from the requirement of OAC rule 3745-21-25(D)(8) because the uncontrolled volatile organic compound (VOC) emissions from this emissions unit are less than 25.0 tons per rolling, 12-month period.

[Authority for term: OAC rule 3745-21-25(D)(9), 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) SMC manufacturing operations shall meet the following work practice standards:

- a. The resin delivery system to the doctor box on the sheet molding compound manufacturing machine must be closed or covered (the doctor box itself may be open). A doctor box is defined as the box or trough on a sheet molding compound manufacturing machine into which the liquid resin paste is delivered before it is metered onto the carrier film; and

- b. A nylon containing film must be used to enclose sheet molding compound.

[Authority for term: OAC rule 3745-21-07(M), OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

- (2) The use of materials containing volatile organic compounds (VOCs), as defined in OAC rule 3745-21-01(B)(6), is prohibited in cleanup/purge operations.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

- a. the company identification of each SMC material produced;
- b. the weight, in pounds, of each SMC material produced;
- c. the total OC content and the VOC content of each SMC material produced, in percent by weight; and
- d. the total OC emissions rate for all SMC materials, in pounds per day, calculated as specified:



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

where:

E_p = total OC emissions from all SMC materials, in pounds per day;

WT = total weight of each SMC material produced as recorded in d)(1)b;

OC = OC content of each SMC paste employed, in percent by weight, as recorded in d)(1)c;

EF = an emissions factor of 0.00239 lb. VOC per lb. available styrene, derived from exhaust gas testing of this emissions unit via US EPA Methods 204, 204B and 204D, conducted on October 21, 2001;

i = subscript denoting an individual SMC material; and

n = the total number of different SMC materials.

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

- (2) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the amount of SMC produced for each type of SMC product, in pounds per month; and
 - b. the monomer content of each SMC product, in percent by weight.

[Note: In lieu of monthly records of the weight and monomer content of each SMC product, as required by OAC rule 3745-21-25(P)(2), the permittee elects to keep daily records of the weight and the VOC content of each SMC material produced as required by d)(2)b and d)(2)c and PTI 02-18224, issued on April 12, 2005. The VOC content is essentially the monomer content.]

[Authority for term: OAC rule 3745-21-25(P)(2) and OAC rule 3745-77-07(C)(1)]

- c. the VOC emissions rate for all SMC materials, in tons per month, which may be calculated as specified in d)(2)d, except that the VOC content, monthly SMC material weight and VOC emissions factor are employed instead of the OC content, daily SMC material weight and OC emissions factor, respectively. Equivalent, alternative method(s), as approved by Ohio EPA may be employed; and
- d. the rolling, 12-month VOC emissions for all SMC materials, in tons per year.

The permittee shall record the VOC emissions from this emissions unit for the recent month and rolling, 12-month period within fifteen days after the end of each month.

[Authority for term: OAC rule 3745-21-25(P)(3) and OAC rule 3745-77-07(C)(1)]



- (3) All records specified under d)(2) shall be retained by the permittee for a period of not less than five years following the date of each occurrence, measurements, maintenance, corrective action, report or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(C)(1)]

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

- a. the company identification of each cleanup material employed;
- b. the volume of each cleanup material employed, in gallons;
- c. the OC content of each cleanup material, in pounds per gallon;
- d. the volume of each waste cleanup material collected for reuse or disposal in gallons;
- e. the volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “b” – “d”, in gallons;
- f. the OC emissions from cleanup materials in pounds per week, calculated as specified:

$$E_c = \sum_{j=1}^m [(VC)(OCc)]_j$$

where:

E_c = weekly OC emissions from cleanup materials, in pounds per week;

VC = volume of each evaporated cleanup material, in gallons, as recorded in d)(4)e;

OCc = OC content of each cleanup material, in pounds per gallon, as recorded in d)(4)c;

j = subscript denoting an individual cleanup material; and

m = the total number of different cleanup materials.

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

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

- a. whether the emissions unit was in operation;
- b. whether the required inspection was performed;



- c. whether the resin delivery system to the doctor box was closed or covered, when resin was present in the resin delivery system (the doctor box itself may be open);
- d. whether nylon containing film was used to enclose the sheet molding compound; and
- e. information on the duration and cause of each deviation and the corrective action(s) taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-18224]

- (6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5895, 63.5900, 63.5915 and 63.5920.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5895, 63.5900, 63.5915 and 63.5920]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. an identification of each week during which the weekly OC emissions from the use of cleanup/purge materials exceeded 261.1 lbs/week, and the actual weekly OC emissions for each such day; and
 - b. an identification of each day during which any cleanup/purge materials with a VOC content were employed.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., the resin delivery system to the doctor box was closed or covered for the reporting period and a nylon containing film was used to enclose SMC for the reporting period); and
 - b. if there were deviations from the work practice standards in c)(1), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.



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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall notify the Ohio EPA, Northeast District Office of any record showing the SMC manufacturing machine exceeded 25 tons of VOC emissions per rolling, 12-month period. A copy of such record shall be sent to Ohio EPA, Northeast District Office within 45 days after exceedance occurs.

[Authority for term: OAC rule 3745-21-25(P)(3) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5905 and 63.5910]

f) Testing Requirements

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

- a. Emission Limitation:

OC emissions shall not exceed 261.1 lbs/week from cleanup/purge operations.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(4)f.

- b. Emission Limitation:

OC emissions shall not exceed 14.09 tons/yr from the production and cleanup/purge operations, combined.

Applicable Compliance Method:

Compliance may be demonstrated based upon the following equation:

$$OC(YR) = \{ \sum_{i=1}^n [E_P]i + \sum_{j=1}^m [E_C]j \} \times \text{ton OC}/2000 \text{ lbs OC}$$

where:

E_P = the OC emissions from all SMC materials, in pounds per day, as recorded in d)(1)d;



i = subscript denoting individual daily emissions from SMC materials;

n = the total number of days of SMC materials production;

E_c = the OC emissions from cleanup/purge materials, in pounds per week, as recorded in d)(4)f;

j = subscript denoting individual weekly emissions from the use of cleanup/purge materials; and

m = the total number of weeks of cleanup/purge materials use.

c. Emission Limitation:

VOC emissions from an uncontrolled SMC manufacturing machine shall be less than 25.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)d.

- (2) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5840, 63.5845 and 63.5850.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5840, 63.5845 and 63.5850]

g) Miscellaneous Requirements

- (1) None.



3. P012, Press 8

Operations, Property and/or Equipment Description:

Compression mold press no. 8 for reinforced plastic composite parts.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See B.8.a)(1) through (7) and c)(1).
b.	OAC rule 3745-21-25(A)(3)	Upon achieving compliance with OAC rule 3745-21-25, the reinforced plastic composites production operations at this facility are not required to meet the requirements of OAC rule 3745-21-07.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
d.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) Work practices for closed molding machines: The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For



machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers shall be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials shall be recovered after slitting.

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

- a. the identification of each mold compound employed in the emissions unit;
- b. the weight, in pounds, of each mold compound employed in the emissions unit;
- c. the total OC emissions rate for all mold compounds, in pounds per day, calculated as specified:

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

where:

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

EF = an emissions factor for styrene emissions which is 0.002 lb. styrene emissions per lb. of sheet mold compound (SMC) input from Engineering Environmental Consulting Services (November 30, 2008) may be employed. The 0.002 lb. styrene emissions per lb. sheet mold compound emissions factor was derived from test results: of process emissions from SMC compression molding during SMC charge preparation and material handling at the Premix plant in North Kingsville, Ohio. Equivalent, alternative method(s), as approved by Ohio EPA may be employed. The permittee may request revisions to the emissions estimation method(s) based upon best information available or information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate(s) for these emissions unit(s). In addition, approved revisions to the emissions estimation method(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an minor modification of this permit;

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

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

[Authority for term: OAC rule 3745-78-02(A)]



- (2) The permittee shall conduct daily inspections of each emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action(s) taken.

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

e) Reporting Requirements

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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1),

f) Testing Requirements

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



a. Emission Limitation:

None.

Emissions Estimation Method:

Emissions may be determined in accordance with the following equation:

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

where:

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

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

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

[Authority for term: OAC rule 3745-78-02(A)]

g) Miscellaneous Requirements

- (1) Emissions unit P012 was installed on June 1, 1969 and not considered a new source as defined in OAC rule 3745-31-01(UUU). Therefore it is not subject to the Permit to Install requirements of OAC rule 3745-31-02(A).



4. P025, Jayco Mixer

Operations, Property and/or Equipment Description:

Jayco mixer 2 for polyester resin/styrene paste production with a baghouse (JAYCODC) to control particulate emissions.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) 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 02-18224 for emissions unit P025, issued on April 12, 2005.	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average. PE shall not exceed 0.52 lb/hr and 2.28 tons/year. Organic compound (OC) emissions shall not exceed 1.49 lbs/hr and 35.8 lbs/day from production operations, 261.1 lbs/week from cleanup/purge operations and 13.3 tons/year from production and cleanup/purge operations, combined. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW. See b)(2)a, c)(1) and c)(2).
b.	OAC rule 3745-17-07(A)	The visible PE limitation required by this applicable rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation required by this applicable rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-07(M)	See b)(2)b.
e.	OAC rule 3745-21-25(D)(1)	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(2).
f.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(2).
g.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

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

- b. Emissions unit P025 is not equipped with control equipment for OC emissions. In accordance with OAC rule 3745-21-07(M)(3), this emissions unit is not subject to the requirements of OAC rule 3745-21-07(M)(2).

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

c) Operational Restrictions

- (1) The use of materials containing volatile organic compounds (VOCs), as defined in OAC rule 3745-21-01(B)(6), is prohibited in cleanup/purge operations.

- (2) All mixing operations shall meet the following work practices:

- a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
- b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent (95%) efficient control device are exempt from this requirement; and



- c. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform weekly 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 emissions incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and



- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

- (3) The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin/styrene paste material produced;
 - b. the weight of each polyester resin/styrene paste material produced, in pounds per day;
 - c. the total OC content of each polyester resin/styrene paste material produced, in percent by weight;
 - d. the total OC emissions rate for all polyester resin/styrene paste materials, in pounds per day, calculated as specified:



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

where:

E_p = total OC emissions from all polyester resin/styrene paste materials, in pounds per day;

WT = total weight of each polyester resin/styrene paste material employed in the mixer as recorded in d)(3)b;

OC = OC content of each polyester resin/styrene paste material mixed, in percent by weight, as recorded in d)(3)c;

EF = an emission factor of 0.000287 lb VOC per lb HAP, as styrene from exhaust gas testing via US EPA Method 25A, conducted on September 27, 2001;

i = subscript denoting an individual polyester resin/styrene paste material; and

n = the total number of different polyester resin/styrene paste materials;

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

f. the average hourly OC emissions rate for all polyester resin/styrene paste materials, i.e., (d) divided by (e), in pounds per hour (average).

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

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

a. the company identification of each cleanup material employed;

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

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

d. the volume of each waste cleanup material collected for reuse or disposal in gallons;

e. the volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “b” – “d”, in gallons;

f. the OC emissions from cleanup materials in pounds per week, calculated as specified:

$$E_c = \sum_{j=1}^m [(VC)(OC_c)]_j$$

where:

E_c = weekly OC emissions from cleanup materials, in pounds per week;



VC = volume of each evaporated cleanup material, in gallons, as recorded in d)(4)e;

OCc = OC content of each cleanup material, in pounds per gallon, as recorded in d)(4)c;

j = subscript denoting an individual cleanup material; and

m = the total number of different cleanup materials.

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

- (5) The permittee shall conduct a daily inspection and maintain a log of these inspections for the emissions unit. The log shall include the compliance status of each work practice standard identified in c)(2) and shall contain the following information:
- a. whether the emissions unit was in operation;
 - b. whether the mixer cover was employed, except when adding materials or changing covers to the mixing vessel;
 - c. whether there was a visible gap present in the mixer cover, except the gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
 - d. whether the mixer vent was open, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and
 - e. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-18224]

- (6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5895, 63.5900, 63.5915 and 63.5920.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5895, 63.5900, 63.5915 and 63.5920]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.



These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
 - f. an identification of each day during which the average hourly OC emissions from the polyester resin/styrene paste mixing exceeded 1.49 lbs/hr, and the actual hourly OC emissions for each such day;
 - g. an identification of each day during which the daily OC emissions from the polyester resin/styrene paste mixing exceeded 35.8 lbs/day, and the actual daily OC emissions for each such day;
 - h. an identification of each week during which the weekly OC emissions from the use of cleanup/purge materials exceeded 261.1 lbs/week, and the actual weekly OC emissions for each such day; and
 - i. an identification of each day during which any cleanup/purge materials with a VOC content were employed.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]



- (3) The permittee shall submit semiannual compliance reports:
- a. if there are no deviations from the work practice standards in c)(2), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., the use of mixer cover with no visible gaps present in the mixer covers, mixer's vents and covers are closed during actual mixing operation, except during addition of materials); and
 - b. if there were deviations from the work practice standards in c)(2), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(A)(3) and 40 CFR 63.5905, 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW]

f) Testing Requirements

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

a. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

PE shall not exceed 0.52 lb/hr.



Applicable Compliance Methods:

Compliance may be based on the determination of the actual worst case emission rate for particulate emissions by the following equation:

$$PE(HR) = PWR \times Solids \times EF \times (1 - CE)$$

where:

PE(HR) = the maximum, controlled hourly PE rate, which is 0.42 lb/hr;

PWR = maximum process weight rate, which is 6200 lbs/hr of materials processed, as specified in the application for this permit;

Solids = solids content, which is 0.6774 lb solids/lb materials processed, as specified in the application;

EF = emission factor for uncontrolled PE, which is 0.01 pound of uncontrolled PE per pound of dry solids processed, as found in Table 6.4-1, AP-42 Chap. 6.4 (5/83); and

CE = control efficiency of the dust collector (baghouse) control device, which is 0.99 as specified in the application.

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 or equivalent, alternative method(s), as approved by Ohio EPA.

c. Emission Limitation:

PE shall not exceed 2.28 tons/yr.

Applicable Compliance Method:

Compliance may be based on the determination of the maximum, controlled, annual emissions by the following equation:

$$PE(YR) = PE (HR) \times Hrs/yr \times ton PE/2000 lbs PE$$

where:

PE(YR) = the maximum PE rate, in tons/yr, which is estimated to be 1.84 tons PE/yr;

PE(HR) = maximum, hourly controlled pollutant emissions, in lbs/hr, as specified in f)(1)b; and

Hrs/yr = the maximum annual operating hours, which is 8,760 hrs/yr.



d. Emission Limitation:

OC emissions from the mixing operations shall not exceed 1.49 lbs/hr.

Applicable Compliance Method(s):

Compliance may be demonstrated based upon the record keeping requirements specified in d)(3)f.

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

e. Emission Limitation:

OC emissions from the mixing operations shall not exceed 35.8 lbs/day.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(3)d.

f. Emission Limitation:

OC emissions from the cleanup/purge operations shall not exceed 261.1 lbs/week.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(4)f.

g. Emission Limitation:

OC emissions from the mixing and cleanup/purge operations shall not exceed 13.3 tons/yr.

Applicable Compliance Method:

Compliance may be demonstrated based upon the following equation(s):

$$OC(YR) = \{ \sum_{i=1}^n [EP]_i + \sum_{j=1}^m [EC]_j \} \times \text{ton OC}/2000 \text{ lbs OC}$$

where:

EP = the OC emissions from all polyester resin/styrene paste materials, in pounds per day, as recorded in d)(3)d;

i = subscript denoting individual daily emissions from polyester resin/styrene paste material mixing;



n = the total number of days of polyester resin/styrene paste material mixing;

EC = the OC emissions from cleanup/purge materials, in pounds per week, as recorded in d)(4)f;

j = subscript denoting an individual weekly emissions from the use of cleanup/purge materials; and

m = the total number of weeks of cleanup/purge materials use.

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

g) Miscellaneous Requirements

(1) None.



5. P027, SMC Line 2 (48")

Operations, Property and/or Equipment Description:

48 inch sheet mold compound (SMC) machine no. 2.

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 02-18224, issued on April 12, 2005 for emissions unit P027	Organic compound (OC) emissions shall not exceed 7.78 lbs/hr from production operations, 261.1 lbs/week from cleanup/purge operations and 18.0 tons/year from production and cleanup/purge operations, combined. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW. See c)(1) and c)(2).
b.	OAC rule 3745-21-07(M)(3)(g)	See b)(2)a.
c.	OAC rule 3745-21-07(M)(5)(e)	OC emissions shall not exceed 61.20 lbs/day from production operations. Total hazardous air pollutant (HAP) emissions shall not exceed 61.20 lbs/day from production operations.
d.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See b)(2)b and c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-21-07(M)(5)(h), the provisions of paragraph (M)(3)(g) of OAC rule 3745-21-07 shall not apply to this emissions unit, when complying with all work practice standards as specified in c)(1).

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

- b. In accordance with OAC rule 3745-21-25(D)(9), this emissions unit is exempt from the requirement of OAC rule 3745-21-25(D)(8) because the uncontrolled volatile organic compound (VOC) emissions from this emissions unit are less than 25.0 tons per rolling, 12-month period.

[Authority for term: OAC rule 3745-21-25(D)(9), 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) SMC manufacturing operations shall meet the following work practice standards:

- a. The resin delivery system to the doctor box on the sheet molding compound manufacturing machine must be closed or covered (the doctor box itself may be open). A doctor box is defined as the box or trough on a sheet molding compound manufacturing machine into which the liquid resin paste is delivered before it is metered onto the carrier film; and

- b. A nylon containing film must be used to enclose sheet molding compound.

[Authority for term: OAC rule 3745-21-07(M), OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

- (2) The use of materials containing VOC, as defined in OAC rule 3745-21-01(B)(6), is prohibited in cleanup/purge operations.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

- a. the company identification of each SMC material produced;



- b. the weight, in pounds, of each SMC material produced;
- c. the total OC content, the VOC content and the total HAP content of each SMC material produced, in percent by weight;
- d. the total OC emissions rate for all SMC materials, in pounds per day, calculated as specified:

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

where:

E_p = total OC emissions from all SMC materials, in pounds per day;

WT = total weight of each SMC material produced as recorded in d)(1)b);

OC = OC content of each SMC paste employed, in percent by weight, as recorded in d)(1)c);

EF = an emissions factor of 0.00389 lb. VOC per lb. available styrene, derived from exhaust gas testing of this emissions unit via US EPA Methods 204, 204B and 204D, conducted on November 18, 2004;

i = subscript denoting an individual SMC material; and

n = the total number of different SMC materials;

- e. the total HAP emissions rate for all SMC materials, in pounds per day, which may be calculated as specified in d)(1)d), except that the HAP content and HAP emissions factor are employed instead of the OC content and the OC emissions factor, respectively. Equivalent, alternative method(s), as approved by Ohio EPA may be employed;
- f. the actual number of hours that the emissions unit was in operation; and
- g. the average hourly OC emissions rate for all SMC materials, i.e., (d) divided by (f), in pounds per hour (average).

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

- (2) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the amount of SMC produced for each type of SMC product, in pounds per month;
 - b. the monomer content of each SMC product, in percent by weight;

[Note: In lieu of monthly records of the weight and monomer content of each SMC product, as required by OAC rule 3745-21-25(P)(2), the permittee elects to keep daily records of the weight and the VOC content of each SMC material produced as required



by d)(1)b. and c. and PTI 02-18224, issued on April 12, 2005. The VOC content is essentially the monomer content.]

[Authority for term: OAC rule 3745-21-25(P)(2) and OAC rule 3745-77-07(C)(1)]

- c. the VOC emissions rate for all SMC materials, in tons per month, which may be calculated as specified in d)(1)d, except that the VOC content, monthly SMC material weight and VOC emissions factor are employed instead of the OC content, daily SMC material weight and OC emissions factor, respectively. Equivalent, alternative method(s), as approved by Ohio EPA may be employed; and
- d. the rolling, 12-month VOC emissions for all SMC materials, in tons per year.

The permittee shall record the VOC emissions from this emissions unit for the recent month and rolling, 12-month period within fifteen days after the end of each month.

[Authority for term: OAC rule 3745-21-25(P)(3) and OAC rule 3745-77-07(C)(1)]

- (3) All records specified under d)(2) shall be retained by the permittee for a period of not less than five years following the date of each occurrence, measurements, maintenance, corrective action, report or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall collect and record the following information for each week for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the volume of each cleanup material employed, in gallons;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the volume of each waste cleanup material collected for reuse or disposal in gallons;
 - e. the volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “b” – “d”, in gallons;
 - f. the OC emissions from cleanup materials in pounds per week, calculated as specified:

$$E_C = \sum_{j=1}^m [(VC)(OCc)]_j$$

where:

E_C = weekly OC emissions from cleanup materials, in pounds per week;



VC = volume of each evaporated cleanup material, in gallons, as recorded in d)(4)e;

OCc = OC content of each cleanup material, in pounds per gallon, as recorded in d)(4)c;

j = subscript denoting an individual cleanup material; and

m = the total number of different cleanup materials.

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

- (5) The permittee shall conduct a daily inspection and maintain a log of these inspections for the emissions unit. The log shall include the compliance status of each work practice standard identified in c)(1) and shall contain the following information:
- a. whether the emissions unit was in operation;
 - b. whether the required inspection was performed;
 - c. whether the resin delivery system to the doctor box was closed or covered, when resin was present in the resin delivery system (the doctor box itself may be open);
 - d. whether nylon containing film was used to enclose the sheet molding compound; and
 - e. information on the duration and cause of each deviation and the corrective action(s) taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-18224]

- (6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5895, 63.5900, 63.5915 and 63.5920.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5895, 63.5900, 63.5915 and 63.5920]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. an identification of each day during which the average hourly OC emissions from the SMC production exceeded 7.78 lbs/hr, and the actual hourly OC emissions for each such day;
 - b. an identification of each day during which the daily OC emissions from the SMC production exceeded 61.20 lbs/day, and the actual daily OC emissions for each such day;



- c. an identification of each day during which the daily total HAP emissions from the SMC production exceeded 61.20 lbs/day, and the actual daily total HAP emissions for each such day;
- d. an identification of each week during which the weekly OC emissions from the use of cleanup/purge materials exceeded 261.1 lbs/week, and the actual weekly OC emissions for each such day; and
- e. an identification of each day during which any cleanup/purge materials with a VOC content were employed.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

(2) The permittee must submit semiannual compliance reports:

- a. if there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., the resin delivery system to the doctor box was closed or covered for the reporting period and a nylon containing film was used to enclose SMC for the reporting period); and
- b. if there were deviations from the work practice standards in c)(1), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall notify the Ohio EPA, Northeast District Office of any record showing the SMC manufacturing machine exceeded 25 tons of VOC emissions per rolling, 12-month period. A copy of such record shall be sent to Ohio EPA, Northeast District Office within 45 days after exceedance occurs.

[Authority for term: OAC rule 3745-21-25(P)(3) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5905 and 63.5910]



f) Testing Requirements

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

a. Emission Limitation:

OC emissions from the SMC production operations shall not exceed 7.78 lbs/hr.

Applicable Compliance Methods:

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

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

b. Emission Limitation:

OC emissions from the SMC production operations shall not exceed 61.20 lbs/day.

Applicable Compliance Method:

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

c. Emission Limitation:

Total HAP emissions from the SMC production operations shall not exceed 61.20 lbs/day.

Applicable Compliance Method:

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

d. Emission Limitation:

OC emissions from the cleanup/purge operations shall not exceed 261.1 lbs/week.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(4)f.



e. Emission Limitation:

OC emissions shall not exceed 18.0 tons/yr from the SMC production and cleanup/purge operations, combined.

Applicable Compliance Method:

Compliance may be demonstrated based upon the following equation(s):

$$OC(YR) = \{ \sum_{i=1}^n [E_P]i + \sum_{j=1}^m [E_C]j \} \times \text{ton OC}/2000 \text{ lbs OC}$$

where:

E_P = the OC emissions from all SMC materials, in pounds per day, as recorded in d)(1)e;

i = subscript denoting individual daily emissions from SMC materials;

n = the total number of days of SMC materials production;

E_C = the OC emissions from cleanup/purge materials, in pounds per week, as recorded in d)(4)f;

j = subscript denoting individual weekly emissions from the use of cleanup/purge materials; and

m = the total number of weeks of cleanup/purge materials use.

f. Emission Limitation:

VOC emissions from an uncontrolled SMC manufacturing machine shall be less than 25.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)d.

- (2) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5840, 63.5845 and 63.5850.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5840, 63.5845 and 63.5850]

g) Miscellaneous Requirements

- (1) None.



6. P028, Cowles Mixer

Operations, Property and/or Equipment Description:

Mixer 1 for polyester resin/styrene paste production with a baghouse to control particulate emissions.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) 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 02-22050 for emissions unit P028, issued on August 22, 2006.	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average. PE shall not exceed 0.52 lb/hr and 2.28 tons/year. Organic compound (OC) emissions shall not exceed 7.94 lbs/hr from production operations, 261.1 lbs/week from cleanup/purge operations and 13.3 tons/year from production and cleanup/purge operations, combined. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW. See b)(2)a, c)(1) and c)(2).
b.	OAC rule 3745-31-05(D)(1)(a) – voluntary restriction to limit volatile organic compound (VOC) and to avoid the Lowest Achievable Emissions Rate (LAER) Offset requirements.	The styrene throughput from production operations at this emissions unit shall not exceed 1,892.75 tons, based upon a rolling, 12-month summation of the throughput rates.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)	The PE limitation required by this applicable rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-07(M)	See b)(2)b.
f.	OAC rule 3745-21-25(D)(1)	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(3).
g.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(3).
h.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

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

b. Emissions unit P028 is not equipped with control equipment for OC emissions. In accordance with OAC rule 3745-21-07(M)(3), this emissions unit is not subject to the requirements of OAC rule 3745-21-07(M)(2).

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

c) Operational Restrictions

(1) The use of materials containing volatile organic compounds (VOCs), as defined in OAC rule 3745-21-01(B)(6), is prohibited in cleanup/purge operations.

(2) All mixing operations shall meet the following work practices:



- a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
- b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent (95%) efficient control device are exempt from this requirement; and
- c. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform weekly 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 emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the



cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

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



- a. the company identification for each resin/styrene paste material produced;
- b. the weight of each polyester resin/styrene paste material produced, in pounds per day;
- c. the total OC content of each polyester resin/styrene paste material produced, in percent by weight;
- d. the styrene content of each polyester resin/styrene paste material produced, in percent by weight;
- e. the total OC emissions rate for all polyester resin/styrene paste materials, in pounds per day, calculated as specified:

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

where:

E_p = total OC emissions from all polyester resin/styrene paste materials, in pounds per day;

WT = total weight of each polyester resin/styrene paste material employed in the mixer as recorded in d)(3)b;

OC = OC content of each polyester resin/styrene paste material mixed, in percent by weight, as recorded in d)(3)c;

EF = an emission factor of 0.00345 lb VOC per lb HAP, as styrene from exhaust gas testing via US EPA Methods, 204, 204B and 204D, conducted on September 30, 2004, with the use of a shroud over the mix vessel;

i = subscript denoting an individual polyester resin/styrene paste material; and

n = the total number of different polyester resin/styrene paste materials;

- f. the actual number of hours that the emissions unit was in operation; and
- g. the average hourly OC emissions rate for all polyester resin/styrene paste materials, i.e., (e) divided by (f), in pounds per hour (average).

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

- (4) The permittee shall collect and record the following information for each week for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the volume of each cleanup material employed, in gallons;
 - c. the OC content of each cleanup material, in pounds per gallon;



- d. the volume of each waste cleanup material collected for reuse or disposal in gallons;
- e. the volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “b” – “d”, in gallons;
- f. the OC emissions from cleanup materials in pounds per week, calculated as specified:

$$E_c = \sum_{j=1}^m [(VC)(OCc)]_j$$

where:

E_c = weekly OC emissions from cleanup materials, in pounds per week;

VC = volume of each evaporated cleanup material, in gallons, as recorded in d)(4)e;

OCc = OC content of each cleanup material, in pounds per gallon, as recorded in d)(4)c;

j = subscript denoting an individual cleanup material; and

m = the total number of different cleanup materials.

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

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

- a. the styrene throughput rate for each month, in tons, calculated as specified:

$$T_s = \sum_{i=1}^n [(WT)(SC)]_i$$

where:

T_s = the styrene throughput from all polyester resin/styrene paste materials, in tons per month;

WT = total weight of each polyester resin/styrene paste material employed in the mixer as recorded in d)(3)b;

SC = styrene content of each polyester resin/styrene paste material mixed, in percent by weight, as recorded in d)(3)d;

i = subscript denoting an individual polyester resin/styrene paste material; and

n = the total number of different polyester resin/styrene paste materials; and



- b. the rolling, 12-month summation of the styrene throughput rates, in tons.

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

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

- a. whether the emissions unit was in operation;
- b. whether the mixer cover was employed, except when adding materials or changing covers to the mixing vessel;
- c. whether there was a visible gap present in the mixer cover, except the gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
- d. whether the mixer vent was open, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and
- e. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22050]

- (7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5895, 63.5900, 63.5915 and 63.5920.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5895, 63.5900, 63.5915 and 63.5920]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the Ohio EPA District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the



manufacturer and outside of the acceptable range following any required compliance demonstration;

- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
- c. each incident of deviation described in "a" where a prompt investigation was not conducted;
- d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- f. an identification of each day during which the average hourly OC emissions from the polyester resin/styrene paste mixing exceeded 7.94 lbs/hr, and the actual hourly OC emissions for each such day;
- g. an identification of each week during which the weekly OC emissions from the use of cleanup/purge materials exceeded 261.1 lbs/week, and the actual weekly OC emissions for each such day;
- h. an identification of each month during which the rolling, 12-month styrene throughput exceeded 1,892.75 tons, and the actual rolling, 12-month styrene throughput for each such month; and
- i. an identification of each day during which any cleanup/purge materials with a VOC content were employed.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standards in c)(2), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., the use of mixer cover with no visible gaps present in the mixer covers, mixer's vents and covers are closed during actual mixing operation, except during addition of materials); and
 - b. if there were deviations from the work practice standards in c)(2), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.



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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(A)(3) and 40 CFR 63.5905, 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW]

f) Testing Requirements

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

- a. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

- b. Emission Limitation:

PE shall not exceed 0.52 lb/hr.

Applicable Compliance Methods:

Compliance may be based on the determination of the actual worst case emission rate for particulate emissions by the following equation:

$$PE(HR) = PWR \times Solids \times EF \times (1 - CE)$$

where:

PE(HR) = the maximum, controlled hourly PE rate, which is 0.42 lb/hr;

PWR = maximum process weight rate, which is 6200 lbs/hr of materials processed, as specified in the application for this permit;

Solids = solids content, which is 0.6774 lb solids/lb materials processed, as specified in the application;



EF = emission factor for uncontrolled PE, which is 0.01 pound of uncontrolled PE per pound of dry solids processed, as found in Table 6.4-1, AP-42 Chap. 6.4 (5/83); and

CE = control efficiency of the dust collector (baghouse) control device, which is 0.99 as specified in the application.

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 or equivalent, alternative method(s), as approved by Ohio EPA.

c. Emission Limitation:

PE shall not exceed 2.28 tons/year.

Applicable Compliance Method:

Compliance may be based on the determination of the maximum, controlled, annual emissions by the following equation:

$$PE(YR) = PE (HR) \times Hrs/yr \times ton PE/2000 lbs PE$$

where:

PE(YR) = the maximum PE rate, in tons/yr, which is estimated to be 1.84 tons PE/yr;

PE(HR) = maximum, hourly controlled pollutant emissions, in lbs/hr, as specified in f)(1)b; and

Hrs/yr = the maximum annual operating hours, which is 8,760 hrs/yr.

d. Emission Limitation:

OC emissions from the production operations shall not exceed 7.94 lbs/hr.

Applicable Compliance Methods:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(3)g.

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

e. Emission Limitation:

OC emissions from the cleanup/purge operations shall not exceed 261.1 lbs/week.



Applicable Compliance Method(s):

Compliance may be demonstrated based upon the record keeping requirements specified in d)(4)f.

f. Emission Limitation:

OC emissions from the production and cleanup/purge operations shall not exceed 13.3 tons/year.

Applicable Compliance Method:

Compliance may be demonstrated based upon the following equation(s):

$$OC(YR) = \{ \sum_{i=1}^n [EP]i + \sum_{j=1}^m [EC]j \} \times \text{ton OC}/2000 \text{ lbs OC}$$

where:

EP = the OC emissions from all polyester resin/styrene paste materials, in pounds per day, as recorded in d)(3)e;

i = subscript denoting individual daily emissions from polyester resin/styrene paste material mixing;

n = the total number of days of polyester resin/styrene paste material mixing;

EC = the OC emissions from cleanup/purge materials, in pounds per week, as recorded in d)(5)f;

j = subscript denoting an individual weekly emissions from the use of cleanup/purge materials; and

m = the total number of weeks of cleanup/purge materials use.

g. Emission Limitation:

The styrene throughput from polyester resin/styrene paste material mixing at this emissions unit shall not exceed 1,892.75 tons, based upon a rolling, 12-month summation of the throughput rates.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(5)b.

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

g) Miscellaneous Requirements

(1) None.



7. Emissions Unit Group -Mold press group A: P010,P011,P017,P018,P020,P021,P026

EU ID	Operations, Property and/or Equipment Description
P010	Compression mold press no. 6 for reinforced plastic composite parts.
P011	Compression mold press no. 7 for reinforced plastic composite parts.
P017	Injection mold press no. 13 with a slitter for reinforced plastic composite parts.
P018	Injection mold press no. 14 with a slitter system for reinforced plastic composite parts.
P020	Compression mold press no. 16 for reinforced plastic composite parts.
P021	Compressions mold press no. 17 for reinforced plastic composite.
P026	Injection mold press no. 21 with a slitter system for reinforced plastic composite parts.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0115596, issued on June 10, 2014, for emissions units P010, P011, P017, P018, P020, P021 and P026.	See b)(2)a.
b.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See B.8.a)(1) through (7) and c)(1).
c.	OAC rule 3745-21-25(A)(3)	Upon achieving compliance with OAC rule 3745-21-25, the reinforced plastic composites production operations at this facility are not required to meet the requirements of OAC rule 3745-21-07.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

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

EU ID	Equipment Description	lbs/hr	lbs/day	tons/yr
P010	Mold press no. 6 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P011	Mold press no. 7 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P017	Mold press no. 13 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P018	Mold press no. 14 for fiberglass reinforced plastic parts	1.93	46.22	8.44
P020	Mold press no. 16 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P021	Mold press no. 17 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P026	Mold press no. 21 for fiberglass reinforced plastic parts	1.93	46.22	8.44

[Authority for term: PTI P0115596, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

- a. the identification of each mold compound employed in the emissions unit;
- b. the weight, in pounds, of each mold compound employed in the emissions unit;
- c. the total OC emissions rate for all mold compounds, in pounds per day, calculated as specified:

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



where:

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

EF = an emissions factor for styrene emissions which is 0.002 lb styrene emissions per lb of sheet mold compound (SMC) input from Engineering Environmental Consulting Services (November 30, 2008) may be employed. The 0.002 lb. styrene emissions per lb. sheet mold compound emissions factor was derived from test results: of process emissions from SMC compression molding during SMC charge preparation and material handling at the Premix plant in North Kingsville, Ohio. Equivalent, alternative method(s), as approved by Ohio EPA may be employed. The permittee may request revisions to the emissions estimation method(s) based upon best information available or information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate(s) for these emissions unit(s). In addition, approved revisions to the emissions estimation method(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an minor modification of this permit;

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

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115596]

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

a. whether the emissions unit was in operation;

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115596]

e) Reporting Requirements

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



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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

(2) The permittee must submit semiannual compliance reports:

- a. if there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine); and
- b. if there were deviations from the work practice standards in c)(1), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

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

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

f) Testing Requirements

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

a. Emission Limitations:

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



EU ID	Equipment Description	lbs/hr	lbs/day	tons/yr
P010	Mold press no. 6 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P011	Mold press no. 7 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P017	Mold press no. 13 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P018	Mold press no. 14 for fiberglass reinforced plastic parts	1.93	46.22	8.44
P020	Mold press no. 16 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P021	Mold press no. 17 for fiberglass reinforced plastic parts	1.81	43.34	7.91
P026	Mold press no. 21 for fiberglass reinforced plastic parts	1.93	46.22	8.44

Applicable Compliance Methods:

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

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

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

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

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

where:

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

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

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

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

- g) Miscellaneous Requirements

- (1) None.



8. Emissions Unit Group - Mold press group B: P022,P023,P024,

EU ID	Operations, Property and/or Equipment Description
P022	Compression mold press no. 18 for reinforced plastic composite parts.
P023	compression molding press #19 for fiberglass reinforced plastic parts.
P024	compression molding press #20 for fiberglass reinforced plastic parts.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0115596, issued on June 10, 2014, for emissions unit P022. PTI P0115595, issued on June 10, 2014, for emissions units P023 and P024.	See b)(2)a.
b.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See B.8.a)(1) through (7) and c)(1).
c.	OAC rule 3745-21-25(A)(3)	Upon achieving compliance with OAC rule 3745-21-25, the reinforced plastic composites production operations at this facility are not required to meet the requirements of OAC rule 3745-21-07.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

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

EU ID	Equipment Description	lbs/hr	tons/yr
P022	Mold press no. 19 for fiberglass reinforced plastic parts	2.60	11.38
P023	Mold press no. 19 for fiberglass reinforced plastic parts	2.64	11.57
P024	Mold press no. 20 for fiberglass reinforced plastic parts	4.06	17.78

[Authority for term: PTI P0115596 and PTI P011595, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

- a. the identification of each mold compound employed in the emissions unit;
- b. the weight, in pounds, of each mold compound employed in the emissions unit;
- c. the total OC emissions rate for all mold compounds, in pounds per day, calculated as specified:

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

where:

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

EF = an emissions factor for styrene emissions which is 0.002 lb styrene emissions per lb of sheet mold compound (SMC) input from Engineering Environmental Consulting Services (November 30, 2008) may be employed. The 0.002 lb. styrene emissions per lb. sheet mold compound emissions factor was derived from test results: of process emissions from SMC compression molding



during SMC charge preparation and material handling at the Premix plant in North Kingsville, Ohio. Equivalent, alternative method(s), as approved by Ohio EPA may be employed. The permittee may request revisions to the emissions estimation method(s) based upon best information available or information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate(s) for these emissions unit(s). In addition, approved revisions to the emissions estimation method(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an minor modification of this permit;

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

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

- d. the actual number of hours that the emissions unit was in operation; and
- e. the average hourly OC emissions rate for all mold compounds, i.e., c. divided by d., in pounds per hour (average).

[Authority for term: OAC rule 3745-77-07(C)(1), PTI P0115596 and PTI P0115595]

- (2) The permittee shall conduct daily inspections of each emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action(s) taken.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI P0115596 and PTI P0115595]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for each emissions unit: an identification of each day during which the average hourly OC emissions from the employment of mold compound(s) exceeded the hourly limit in b)(2)a, and the actual hourly OC emissions for each such day.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]



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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

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

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

f) Testing Requirements

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

- a. Emission Limitations:

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

EU ID	Equipment Description	lbs/hr	tons/yr
P022	Mold press no. 19 for fiberglass reinforced plastic parts	2.60	11.38
P023	Mold press no. 19 for fiberglass reinforced plastic parts	2.64	11.57
P024	Mold press no. 20 for fiberglass reinforced plastic parts	4.06	17.78

Applicable Compliance Methods:

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

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A,



Methods 1 through 4 and Method 18, 21, 24 or 25 or equivalent, alternative method(s), as approved by Ohio EPA.

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

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

where:

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

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

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

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

- g) Miscellaneous Requirements

- (1) None.



9. Emissions Unit Group -Mold press group C: P030,P031,P032,P033,P034,

EU ID	Operations, Property and/or Equipment Description
P030	Compression mold press no. 22 for reinforced plastic composite parts.
P031	Compression mold press no. 23 for reinforced plastic composite parts.
P032	Compression mold press no. 24 for reinforced plastic composite parts.
P033	Compression mold press no. 25 for reinforced plastic composite parts.
P034	Compression mold press no. 26 with a slitter system for reinforced plastic composite parts.

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 P0115594, issued on November 21, 2013 for emissions units P030, P031, P032, P033 and P034.	See b)(2)a.
b.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See B.8.a)(1) through (7) and c)(1).
c.	OAC rule 3745-21-25(A)(3)	Upon achieving compliance with OAC rule 3745-21-25, the reinforced plastic composites production operations at this facility are not required to meet the requirements of OAC rule 3745-21-07.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

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

EU ID	Equipment Description	lbs/hr	tons/yr
P030	Mold press no. 22 for fiberglass reinforced plastic parts	2.31	10.14
P031	Mold press no. 23 for fiberglass reinforced plastic parts	2.31	10.14
P032	Mold press no. 24 for fiberglass reinforced plastic parts	2.31	10.14
P033	Mold press no. 25 for fiberglass reinforced plastic parts	2.31	10.14
P034	Mold press no. 26 for fiberglass reinforced plastic parts	2.31	10.14

[Authority for term: PTI P0115594, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

- a. the identification of each mold compound employed in the emissions unit;
- b. the weight, in pounds, of each mold compound employed in the emissions unit;
- c. the total OC emissions rate for all mold compounds, in pounds per day, calculated as specified:

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

where:

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

EF = an emissions factor for styrene emissions which is 0.002 lb styrene emissions per lb of sheet mold compound (SMC) input from Engineering Environmental Consulting Services (November 30, 2008) may be employed. The 0.002 lb. styrene emissions per lb. sheet mold compound emissions factor was



derived from test results: of process emissions from SMC compression molding during SMC charge preparation and material handling at the Premix plant in North Kingsville, Ohio. Equivalent, alternative method(s), as approved by Ohio EPA may be employed. The permittee may request revisions to the emissions estimation method(s) based upon best information available or information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate(s) for these emissions unit(s). In addition, approved revisions to the emissions estimation method(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an minor modification of this permit;

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

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

- d. the actual number of hours that the emissions unit was in operation; and
- e. the average hourly OC emissions rate for all mold compounds, i.e., (d) divided by (e), in pounds per hour (average).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115594]

- (2) The permittee shall conduct daily inspections of each emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action(s) taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115594]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for each emissions unit: an identification of each day during which the average hourly OC emissions from the employment of mold compound(s) exceeded the hourly limit in b)(2)a, and the actual hourly OC emissions for each such day.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]



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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

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

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

f) Testing Requirements

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

- a. Emission Limitations:

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

EU ID	Equipment Description	lbs/hr	tons/yr
P030	Mold press no. 22 for fiberglass reinforced plastic parts	2.31	10.14
P031	Mold press no. 23 for fiberglass reinforced plastic parts	2.31	10.14
P032	Mold press no. 24 for fiberglass reinforced plastic parts	2.31	10.14
P033	Mold press no. 25 for fiberglass reinforced plastic parts	2.31	10.14
P034	Mold press no. 26 for fiberglass reinforced plastic parts	2.31	10.14

Applicable Compliance Methods:

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

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions



tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 21, 24 or 25 or equivalent, alternative method(s), as approved by Ohio EPA.

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

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

where:

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

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

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

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

- g) Miscellaneous Requirements

- (1) None.