



4/27/2015

Certified Mail

John Slupecki  
 Bulk Molding Compounds, Inc.  
 12600 Eckel Road  
 Perrysburg, OH 43551

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0387040001  
 Permit Number: P0118572  
 Permit Type: Administrative Modification  
 County: Wood

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614)644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NWDO; Michigan; Indiana; Canada



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Bulk Molding Compounds, Inc.**

Facility ID:	0387040001
Permit Number:	P0118572
Permit Type:	Administrative Modification
Issued:	4/27/2015
Effective:	4/27/2015





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Bulk Molding Compounds, Inc.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. Federally Enforceable Standard Terms and Conditions .....	4
2. Severability Clause .....	4
3. General Requirements .....	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting .....	6
6. Compliance Requirements .....	6
7. Best Available Technology .....	7
8. Air Pollution Nuisance .....	8
9. Reporting Requirements .....	8
10. Applicability .....	8
11. Construction of New Sources(s) and Authorization to Install .....	8
12. Permit-To-Operate Application .....	9
13. Construction Compliance Certification .....	10
14. Public Disclosure .....	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	10
16. Fees.....	10
17. Permit Transfers .....	10
18. Risk Management Plans .....	10
19. Title IV Provisions .....	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions .....	13
1. P011, Mixer 08.....	14
2. P013, Mixer 09.....	22
3. P016, ETR-024 .....	30
4. P027, Mixer 03.....	32
5. P028, ETR-026 .....	39
6. P029, Mixer 04.....	41





**Final Permit-to-Install**  
Bulk Molding Compounds, Inc.  
**Permit Number:** P0118572  
**Facility ID:** 0387040001  
**Effective Date:** 4/27/2015

## Authorization

Facility ID: 0387040001  
Facility Description: Bulk molding compounds.  
Application Number(s): M0003290, M0003333, M0003334  
Permit Number: P0118572  
Permit Description: Agency-initiated modification to address BAT emission limitations associated with OAC rule 3745-21-07(G) for emissions units P011, P013, P016 and P029 and material mistakes for emissions units P027 and P028.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 4/27/2015  
Effective Date: 4/27/2015

This document constitutes issuance to:

Bulk Molding Compounds, Inc.  
12600 Eckel Road  
Perrysburg, OH 43551

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0118572  
Permit Description: Agency-initiated modification to address BAT emission limitations associated with OAC rule 3745-21-07(G) for emissions units P011, P013, P016 and P029 and material mistakes for emissions units P027 and P028.

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

<b>Emissions Unit ID:</b>	<b>P011</b>
Company Equipment ID:	Mixer 08
Superseded Permit Number:	03-9519
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	Mixer 09
Superseded Permit Number:	03-9519
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	ETR-024
Superseded Permit Number:	03-9519
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P027</b>
Company Equipment ID:	Mixer 3
Superseded Permit Number:	03-16038
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P028</b>
Company Equipment ID:	ETR 026
Superseded Permit Number:	03-16038
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P029</b>
Company Equipment ID:	Mixer 04
Superseded Permit Number:	03-17003
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Bulk Molding Compounds, Inc.  
**Permit Number:** P0118572  
**Facility ID:** 0387040001  
**Effective Date:** 4/27/2015

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

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



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

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



**13. Construction Compliance Certification**

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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



**Final Permit-to-Install**  
Bulk Molding Compounds, Inc.  
**Permit Number:** P0118572  
**Facility ID:** 0387040001  
**Effective Date:** 4/27/2015

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



**Final Permit-to-Install**  
Bulk Molding Compounds, Inc.  
**Permit Number:** P0118572  
**Facility ID:** 0387040001  
**Effective Date:** 4/27/2015

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.



**Final Permit-to-Install**  
Bulk Molding Compounds, Inc.  
**Permit Number:** P0118572  
**Facility ID:** 0387040001  
**Effective Date:** 4/27/2015

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



**1. P011, Mixer 08**

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

Mixer used to manufacture bulk molding compounds. (Littleford Mixer)

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

(1) d)(3) - d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	stack emissions: 0.30 lb particulate emissions (PE)/hr  1.67 lbs organic compounds (OC)/hr and 7.31 tons OC/year  fugitive emissions: 1.50 lbs PE/hr  stack & fugitive emissions: 8.1 tons PE/year
b.	OAC rule 3745-17-11(B)	none[See b)(2)a.]
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-08(B)	none[See b)(2)b.]
e.	OAC rule 3745-17-07(B)	none[See b)(2)c.]
f.	40 CFR Part 63, Subpart WWWW  [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)d.
g.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)e.



(2) Additional Terms and Conditions

- a. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- c. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- d. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations. The permittee shall meet the following work practice standards:
  - i. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
  - ii. 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 95 percent efficient control device are exempt from this requirement; and
  - iii. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
- e. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit(s). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
  - a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.



- b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - i. the date and time the deviation began;
  - ii. the magnitude of the deviation at that time;
  - iii. the date(s) the investigation was conducted;
  - iv. the names of the personnel who conducted the investigation; and
  - v. the findings and recommendations.
  
- c. 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 below, unless the permittee determines that corrective action is not necessary.
  - i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective actions was not necessary:
    - (a) the reason(s) corrective action was not necessary; and
    - (b) the date and time the deviation ended.
  - ii. The permittee shall maintain records of the following information for each deviation when corrective action was taken:
    - (a) a description of the corrective action;
    - (b) the date it was completed;
    - (c) the date and time the deviation ended;
    - (d) the total period of time (in minutes) during which there was a deviation;
    - (e) the pressure drop reading immediately after the corrective action; and
    - (f) the names of the personnel who performed the work.
  - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



- d. The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.
  - e. This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit(s). In addition, approved revisions to the ranges will not constitute a modification or relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. 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 location and 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 each visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- (3) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (ug/m3): 213,000

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,470

MAGLC (ug/m3): 5,071



- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:



- a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in e)(1)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in e)(1)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; and
  - d. an identification of each incident of deviation described in e)(1)a. where proper records were not maintained for the investigation and/or the corrective action.
- (2) The permittee shall submit semiannual written reports that:
- a. identify all days during which any visible fugitive particulate emissions were observed from any building openings housing this emissions unit, and
  - b. describe any corrective actions taken to eliminate the visible emissions.
- These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit annual reports that summarize the total actual OC emissions, in tons, from mixing operations. The report shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (4) The permittee must submit semiannual compliance reports:
- a. if there are no deviations from the work practice standards in b)(2)d.i - b)(2)d.iii, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and
  - b. if there were deviations with the work practice standards in b)(2)d.i - b)(2)d.iii, 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.



f) Testing Requirements

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

a. Emission Limitation:

0.30 lb PE/hr (stack emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times (EF \times (1-CE))$$

E = particulates emissions rate (lbs/hr)

$$EF = 2.75 \text{ lbs PE/ton}^{**}$$

CE = control efficiency of the control system (assumed to be 99 percent).

\* as included in the permit application (claimed confidential by the applicant)

\*\* from company material balance calculations

b. Emission Limitation:

1.50 lbs PE/hr (fugitive emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times 0.69^{**}$$

E = particulates emission rate (lbs/hr)

\* as included in the permit application (claimed confidential by the applicant)

\*\* This represents the uncontrolled emission factor of fugitive emissions (25% of 2.75 lbs PE/ton).

c. Emission Limitation:

8.1 tons PE/year (stack and fugitive)

Applicable Compliance Method:

As long as compliance with the hourly emission rates of 0.30 lb PE/hr (stack) and 1.5 lbs PE/hr (fugitive) is maintained, compliance with the annual emission



limitation shall be assumed [the 8.1 TPY PE limitation is greater than the potential to emit for this emissions unit based upon multiplying the hourly PE emission rate (stack and fugitive combined) by 8760].

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitations:

1.67 lbsOC/hr and 7.31 tons OC/year

Applicable Compliance Method:

The hourly emission limitation was established based on stack test data of a similar source. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.



**2. P013, Mixer 09**

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

Mixer used to manufacture bulk molding compounds. (Line 9 Henschel Mixer)

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

(1) d)(3) - d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	stack emissions: 0.30 lb particulate emissions (PE)/hr  1.67 lbs organic compounds (OC)/hr and 7.31 tons OC/year  fugitive emissions: 1.20 lbs PE/hr  stack & fugitive emissions: 6.5 tons PE/year
b.	OAC rule 3745-17-11(B)	none[See b)(2)a.]
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-08(B)	none[See b)(2)b.]
e.	OAC rule 3745-17-07(B)	none[See b)(2)c.]
f.	40 CFR Part 63, Subpart WWWW  [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)d.
g.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)e.



- (2) Additional Terms and Conditions
  - a. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
  - b. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
  - c. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
  - d. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.
  - e. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit(s). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
    - a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.
    - b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
      - i. the date and time the deviation began;
      - ii. the magnitude of the deviation at that time;
      - iii. the date(s) the investigation was conducted;
      - iv. the names of the personnel who conducted the investigation; and
      - v. the findings and recommendations.



- c. 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 below, unless the permittee determines that corrective action is not necessary.
    - i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective actions was not necessary:
      - (a) the reason(s) corrective action was not necessary; and
      - (b) the date and time the deviation ended.
    - ii. The permittee shall maintain records of the following information for each deviation when corrective action was taken:
      - (a) a description of the corrective action;
      - (b) the date it was completed;
      - (c) the date and time the deviation ended;
      - (d) the total period of time (in minutes) during which there was a deviation;
      - (e) the pressure drop reading immediately after the corrective action; and
      - (f) the names of the personnel who performed the work.
    - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
  - d. The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.
  - e. This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit(s). In addition, approved revisions to the ranges will not constitute a modification or relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. 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 location and 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 each visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- (3) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (ug/m3): 213,000

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,470

MAGLC (ug/m3): 5,071

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the recovery baghouse BH-2 field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in e)(1)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in e)(1)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; and
  - d. an identification of each incident of deviation described in e)(1)a. where proper records were not maintained for the investigation and/or the corrective action.



- (2) The permittee shall submit semiannual written reports that:
- a. identify all days during which any visible fugitive particulate emissions were observed from any building openings housing this emissions unit, and
  - b. describe any corrective actions taken to eliminate the visible emissions.

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

- (3) The permittee shall submit annual reports that summarize the total actual OC emissions, in tons, from mixing operations. The report shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections:
- a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.
  - b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.
  - c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

f) Testing Requirements

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

a. Emission Limitation:

0.30 lb PE/hr (stack emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times (EF \times (1-CE))$$

E = particulates emissions rate (lbs/hr)



EF = 2.4 lbs PE/ton\*\*

CE = control efficiency of the control system (assumed to be 99 percent).

\* as included in the permit application (claimed confidential by the applicant)

\*\* This uncontrolled emissions factor from AP-42, Table 11.13-2 (originally 3.0 lbs PE/ton) was modified to account for an 80% capture efficiency.

b. Emission Limitation:

1.20 lbs PE/hr (fugitive emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times 0.75^{**}$

E = particulates emission rate (lbs/hr)

\* as included in the permit application (claimed confidential by the applicant)

\*\* This represents the uncontrolled emission factor of fugitive emissions (25% of 3.0 lbs PE/ton).

c. Emission Limitation:

6.5 tons PE/year (stack and fugitive)

Applicable Compliance Method:

As long as compliance with the hourly emission rates of 0.30 lb PE/hr (stack) and 1.2 lbs PE/hr (fugitive) is maintained, compliance with the annual emission limitation shall be assumed [the 6.5 TPY PE limitation is greater than the potential to emit for this emissions unit based upon multiplying the hourly PE emission rate (stack and fugitive combined) by 8760].

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitations:

1.67 lbs OC/hr and 7.31 tons OC/year



Applicable Compliance Method:

The hourly emission limitation was established based on stack test data of a similar source. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

- g) Miscellaneous Requirements
  - (1) None.



**3. P016, ETR-024**

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

Bulk molding compound extruder/bulk packing.(Littleford extruder)

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 operations(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. 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)	1.67lbs organic compounds (OC)/hr and 7.31 tons OC/yr

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitations:

1.67lbs OC/hr and 7.31 tons OC/yr



Applicable Compliance Method:

The hourly and annual emission limitations are based on the emission unit's potential to emit\*. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The hourly potential to emit for this emissions unit is based on testing of similar operations. If required, compliance with the hourly limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 204 through 204F of 40 CFR Part 51, Appendix M.

The annual potential to emit for this emissions unit is based on the hourly emissions multiplied by a maximum operating schedule of 8,760 hours/year and then divided by 2000 pounds/ton.

- g) Miscellaneous Requirements
  - (1) None.



**4. P027, Mixer 03**

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

Mixer used to manufacture bulk molding compounds. (600 liter mixer)

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

(1) d)(2) - d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	0.02 grain particulate matter of 10 microns or less (PM10) per dscf, 1.49 tons PM10 per year [see b)(2)a. and b)(2)b. below]  1.67 pounds organic compounds (OC) /hour and 7.31 tons OC/year  Visible PE shall not exceed 0% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	none[See b)(2)c.]
c.	OAC rule 3745-17-07(A)	none[See b)(2)d.]
d.	40 CFR Part 63, Subpart WWWW  [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)e.
e.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)f.
f.	OAC rule 3745-114 ORC 3704.03(F)	See d)(2) - d)(4)



(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be compliance with the terms and conditions of this permit and the use of a dust collector that is capable of achieving 0.02 grain PM10/dscf.
- b. All emissions of particulate matter are PM10.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- d. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- e. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.
- f. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit(s). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.
  - b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
    - i. the date and time the deviation began;
    - ii. the magnitude of the deviation at that time;
    - iii. the date(s) the investigation was conducted;



- iv. the names of the personnel who conducted the investigation; and
  - v. the findings and recommendations.
- c. 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 below, unless the permittee determines that corrective action is not necessary.
- i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective actions was not necessary:
    - (a) the reason(s) corrective action was not necessary; and
    - (b) the date and time the deviation ended.
  - ii. The permittee shall maintain records of the following information for each deviation when corrective action was taken:
    - (a) a description of the corrective action;
    - (b) the date it was completed;
    - (c) the date and time the deviation ended;
    - (d) the total period of time (in minutes) during which there was a deviation;
    - (e) the pressure drop reading immediately after the corrective action; and
    - (f) the names of the personnel who performed the work.
  - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
- d. The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.
- e. This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit(s). In addition, approved revisions to the ranges will not constitute a modification or relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.



- (2) The Permit to Install for this emissions unit P027 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV ( g/m<sup>3</sup>): 85,202

Maximum Hourly Emission Rate (lbs/hr): 1.67\*

Predicted 1-Hour Maximum Ground-Level Concentration ( g/m<sup>3</sup>): 78.56

MAGLC ( g/m<sup>3</sup>): 2,028

\* This is the potential to emit of OC based on lbs OC/batch and the amount of batches run in one hour. All OC emissions are considered styrene as worst-case.

- (3) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not



be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

- (4) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
  - (1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
    - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
    - b. an identification of each incident of deviation described in e)(1)a. where a prompt investigation was not conducted;
    - c. an identification of each incident of deviation described in e)(1)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; and
    - d. an identification of each incident of deviation described in e)(1)a. where proper records were not maintained for the investigation and/or the corrective action.
  - (2) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections:
    - a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.
    - b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.



- c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

f) Testing Requirements

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

- a. Emission Limitations:

0.02 grain PM10/dscf; 1.49 tons PM10/yr

Applicable Compliance Method:

The 0.02 grain PM10/dscf emission limitation was established in accordance with the baghouse manufacturer's guaranteed, maximum outlet grain loading. If required, compliance with the particulate emissions limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S.EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual limitation was established by multiplying the maximum outlet concentration from the baghouse (0.02 grain PM10/dscf) by the maximum volumetric air flow (1980 dscfm), 60 minutes/hour, and a maximum operating schedule of 8760 hours/year, and then dividing by 7000 grains/pound and 2000 pounds/ton. Therefore, provided compliance is demonstrated with the maximum outlet concentration, compliance with the annual limitation will be assumed.

- b. Emission Limitations:

1.67 lbs OC/hour and 7.31 tons OC/year

Applicable Compliance Method:

The hourly emission limitation was established based on stack test data of a similar source. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.



c. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



**5. P028, ETR-026**

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

Extruder(s) used to form bulk molding compounds manufactured in Mixer #9.

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 operations(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. 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)	1.67 pounds organic compounds (OC)/hour and 7.31 tons OC/year

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitations:

1.67 pounds OC/hour and 7.31 tons OC/year



Applicable Compliance Method:

The hourly and annual emission limitations are based on the emission unit's potential to emit\*. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The hourly potential to emit for this emissions unit is based on testing of similar operations. If required, compliance with the hourly limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 204 through 204F of 40 CFR Part 51, Appendix M.

The annual potential to emit for this emissions unit is based on the hourly emissions multiplied by a maximum operating schedule of 8,760 hours/year and then divided by 2000 pounds/ton.

- g) Miscellaneous Requirements
  - (1) None.



**6. P029, Mixer 04**

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

75 gallon mixer with one weighout hopper, one filler holding tank, two resin day tanks, two drum stations, one minors weighout station, and conveying.

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)	0.02 grain particulate matter of 10 microns or less (PM10) per dscf, 1.49 tons PM10 per year [See b)(2)a. and b)(2)b.]  1.67 lbs organic compounds (OC)/hr and 7.31 tons OC/year[See b)(2)c.]  Visible PE shall not exceed 0% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	none[See b)(2)d.]
c.	OAC rule 3745-17-07(A)	none[See b)(2)e.]
d.	40 CFR Part 63, Subpart WWWW  [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)f.
e.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)g.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be compliance with the terms and conditions of this



permit and the use of a dust collector that is capable of achieving 0.02 grain PM10/dscf.

- b. All emissions of particulate matter are PM10.
- c. All OC's are VOC's.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- e. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- f. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.
- g. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit(s). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

- a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.
- b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - i. the date and time the deviation began;
  - ii. the magnitude of the deviation at that time;
  - iii. the date(s) the investigation was conducted;
  - iv. the names of the personnel who conducted the investigation; and



- v. the findings and recommendations.
- c. 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 below, unless the permittee determines that corrective action is not necessary.
  - i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective actions was not necessary:
    - (a) the reason(s) corrective action was not necessary; and
    - (b) the date and time the deviation ended.
  - ii. The permittee shall maintain records of the following information for each deviation when corrective action was taken:
    - (a) a description of the corrective action;
    - (b) the date it was completed;
    - (c) the date and time the deviation ended;
    - (d) the total period of time (in minutes) during which there was a deviation;
    - (e) the pressure drop reading immediately after the corrective action; and
    - (f) the names of the personnel who performed the work.
  - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
- d. The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.
- e. This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit(s). In addition, approved revisions to the ranges will not constitute a modification or relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in e)(1)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in e)(1)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; and
  - d. an identification of each incident of deviation described in e)(1)a. where proper records were not maintained for the investigation and/or the corrective action.
- (2) The permittee shall submit annual reports that summarize the total actual OC emissions, in tons, from mixing operations. The report shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (3) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections:
  - a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.
  - b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.
  - c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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:  
0.02 grain PM10/dscf; 1.49 tons PM10/yr



Applicable Compliance Method:

The 0.02 grain PM10/dscf emissions limitation represents the potential to emit\* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit was established in accordance with the maximum outlet grain loading concentration for the baghouse. If required, compliance with the particulate emissions limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual limitation was established by multiplying the maximum outlet concentration from the baghouse (0.02 grain PM10/dscf) by the maximum volumetric air flow (1980 dscfm), 60 minutes/hour, and a maximum operating schedule of 8760 hours/year, and then dividing by 7000 grains/pound and 2000 pounds/ton. Therefore, provided compliance is demonstrated with the maximum outlet concentration, compliance with the annual limitation will be assumed.

b. Emission Limitations:

1.67 lbs OC/hr and 7.31 tons OC/year

Applicable Compliance Method:

The hourly emission limitation was established based on stack test data of a similar source. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

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



**Final Permit-to-Install**  
Bulk Molding Compounds, Inc.  
**Permit Number:** P0118572  
**Facility ID:** 0387040001  
**Effective Date:**4/27/2015

g) Miscellaneous Requirements

(1) None.