



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

5/15/2015

Certified Mail

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

Facility ID: 0387040001
Permit Number: P0116259
County: Wood

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

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal

Bulk Molding Compounds, Inc.

12600 Eckel Road, , Perrysburg, OH 43551

ID#: P0116259

Date of Action: 5/15/2015

PermitDesc: Renewal Title V operating permit for a bulk molding compound facility..

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



Statement of Basis
 Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0387040001
Facility Name:	Bulk Molding Compounds, Inc.
Facility Description:	bulk molding compounds.
Facility Address:	12600 Eckel Road, Perrysburg, OH 43551
Permit #:	P0116259, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	no
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



P011 P013 P016 P027 P028 P029	OC: 1.67 lb/hr and 7.31 tpy	N	Y	N	N	N	N	N	N	N	N	N	Basis: OAC rule 3745-31-05(A)(3) M,R,Rp,ET: Emission limitations represent the PTE; if required, the permittee shall demonstrate compliance through emissions testing. CAM does not apply because the emissions unit is uncontrolled for this pollutant.
P017	OC: 8.50 tons/yr (rolling)	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET – M,R,Rp are sufficient to demonstrated compliance.
P025	OC: 1.88 lb/hr and 7.3 tpy	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp, requirements are sufficient to demonstrate compliance. if required, the permittee shall demonstrate compliance through emissions testing. CAM does not apply because the emissions unit is uncontrolled for this pollutant.
P026	OC: 3.30 lb/hr and 14.45 tpy	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp, requirements are sufficient to demonstrate compliance. if required, the permittee shall demonstrate compliance through emissions testing. CAM does not apply because the emissions unit is uncontrolled for this pollutant.
P030 P031	VOC: 1.67 lb/hr and 7.31 tpy	N	Y	N	N	N	N	N	N	N	N	N	Basis: OAC rule 3745-31-05(A)(3), as effective 11/30/01 M,R,Rp,ET: Emission limitations represent the PTE; if required, the permittee shall demonstrate compliance through emissions testing. CAM does not apply because the emissions unit is uncontrolled for this pollutant. Once USEPA approves the 12/01/06 version of this rule, these emission limitations no longer apply.
P030 P031	None	N	Y	Y									Basis: OAC rule 3745-31-05(A)(3), as effective 12/01/06 ND: BAT does not apply to the VOC emissions because the UMRE is less than 10 tpy. This rule becomes effective once USEPA approves this rule as part of the SIP.
P011 P013	PE: 0.30 lb/hr (stack), 1.50 lb/hr (fugitive)	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp for the baghouse are sufficient to demonstrate compliance. Actual emission rate is determined by emission calculation. CAM does not apply because the UMRE is less than 100 tpy.
P011	PE: 1.50 lb/hr (fugitive)	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp for visible emissions checks for fugitive dust are sufficient to demonstrate compliance. Actual emission rate is determined by emission calculation.



P011	PE: 8.10 tpy (combined)	N	Y	N	N	N	N	N	N	N	N	N	Basis: OAC rule 3745-31-05(A)(3) M,R,Rp,ET: Emission limitation represents the lb/hr limits as 8760 hrs/hr; therefore provided compliance is demonstrated with the hourly, compliance with the annual shall also be demonstrated.
P013	PE: 1.20 lb/hr (fugitive)	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp for visible emissions checks for fugitive dust are sufficient to demonstrate compliance. Actual emission rate is determined by emission calculation.
P013	PE: 6.50 tpy (combined)	N	Y	N	N	N	N	N	N	N	N	N	Basis: OAC rule 3745-31-05(A)(3) M,R,Rp,ET: Emission limitation represents the lb/hr limits as 8760 hrs/hr; therefore provided compliance is demonstrated with the hourly, compliance with the annual shall also be demonstrated.
P023	PE: 4.1 lbs/hr	17-11(B)	N	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp for the baghouse are sufficient to demonstrate compliance. If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(10).
P025	PE: 0.15 lb/hr and 0.66 tpy	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp for the baghouse are sufficient to demonstrate compliance. Actual emission rate is determined by emission calculation. CAM does not apply because the UMRE is less than 100 tpy.
P027 P029	PM10: 0.02 gr/dscf and 1.49 tpy	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET: M,R,Rp for the baghouse are sufficient to demonstrate compliance. If required, the permittee shall demonstrate compliance through emission testing. CAM does not apply because the UMRE is less than 100 tpy.
P030 P031	PM10: 0.02 gr/dscf and 1.49 tpy	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(F) ET: M,R,Rp for the baghouse are sufficient to demonstrate compliance. If required, the permittee shall demonstrate compliance through emission testing. CAM does not apply because the UMRE is less than 100 tpy.
P011 P013 P023	PE: 20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	N	N	N	ET – M,R,Rp are sufficient to demonstrated compliance. If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).



Statement of Basis
 Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001

P025 P027 P029	PE: 0% opacity	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) ET – M,R,Rp are sufficient to demonstrated compliance. If required, compliance shall be demonstrated in accordance with Method 9 observations.
P030 P031	PE: 0% opacity	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(F) ET – M,R,Rp are sufficient to demonstrated compliance. If required, compliance shall be demonstrated in accordance with Method 9 observations.
P011 P013 P023	None	17-08(B)	N	Y									ND: Facility is not located in an Appendix A area.
P011 P013 P023	None	17-07(B)	N	Y									ND: OAC rule 3745-17-08 is not applicable, therefore this rule is not applicable.
P025 P027 P029 P030 P031	None	17-07(A)	N	Y									ND: Emission limitation specified is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
P025 P027 P029 P030 P031	None	17-11(B)	N	Y									ND: Emission limitation specified is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
P011 P013 P017 P023 P025 P027 P029 P030 P031	Work practice standards		40 CFR Part 63 Subpart WWWW	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp requirements are sufficient to demonstrate compliance.



Statement of Basis
Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001

P011	Work practice standards	21-25		N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp requirements are sufficient to demonstrate compliance.
P013													
P023													
P025													
P026													
P027													
P028													
P029													
P030													
P031													



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Bulk Molding Compounds, Inc.**

Facility ID:	0387040001
Permit Number:	P0116259
Permit Type:	Renewal
Issued:	5/15/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Bulk Molding Compounds, Inc.

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Draft Title V Permit
Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0387040001
Facility Description: bulk molding compounds.
Application Number(s): M0000986, A0047954, A0048151, A0048309
Permit Number: P0116259
Permit Description: Renewal Title V operating permit for a bulk molding compound facility.
Permit Type: Renewal
Issue Date: 5/15/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0105188

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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



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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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



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

4. Risk Management Plans

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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



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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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



10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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



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

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



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

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

14. Permit Shield

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

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

15. Operational Flexibility

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

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

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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



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

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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



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

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

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

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

28. Permit Transfers

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

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

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

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

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

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



30. Submitting Documents Required by this Permit

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



Draft Title V Permit
Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.
 - a) T001 - 8,000 gallon polyester resin storage tank (PTI #03-6089);
 - b) T014 - 12,000 gallon vinyl ester resin storage tank (PTI #03-7934);
 - c) T015 - 12,000 gallon styrene monomer storage tank (PTI #03-1274);
 - d) T016 - 12,000 gallon vinyl toluene storage tank (PTI #03-1274).

[OAC rule 3745-77-07(C)(1), PTI #03-6089, PTI #03-7934, and PTI #03-1274]

3. The above insignificant emissions units are subject to 40 CFR Part 63, Subpart WWWW. The applicable requirements of this rule are summarized below:
 - a) Pursuant to 40 CFR Part 63.5805(b), emissions units T001, T014, T015, and T016 shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Item #3 - For a new or existing HAP-containing materials storage operation.

[40 CFR Part 63, Subpart WWWW]
 - b) Pursuant to 40 CFR Part 63.5860(a), emissions units T001, T014, T015, and T016 shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #3 - For a new or existing HAP-containing materials storage operation.

[40 CFR Part 63, Subpart WWWW]
 - c) Pursuant to 63.5905(a), emissions units T001, T014, T015, and T016 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.

[40 CFR Part 63, Subpart WWWW]
 - d) Pursuant to 63.5910(a), (b), (g), and (h), emissions units T001, T014, T015, and T016 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.

[40 CFR Part 63, Subpart WWWW]



Draft Title V Permit
Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001
Effective Date: To be entered upon final issuance

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) (PTI #P0118572, issued 04/27/2015)	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.
h.	OAC rule 3745-21-25	See b)(2)f.



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

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

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 a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (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.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (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

[PTI #P0118572]

- (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.

[PTI #P0118572]

- (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.

[PTI #P0118572]

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

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

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

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 a. where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (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.



Effective Date: To be entered upon final issuance

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (3) 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.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI# P0118572]

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

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

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

- 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:



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

$E = \text{particulates emissions rate (lbs/hr)}$

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

$CE = \text{control efficiency of the control system (assumed to be 99 percent)}$.

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

** from company material balance calculations

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

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:

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

$E = \text{particulates emission rate (lbs/hr)}$

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

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

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

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 demonstrated [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].

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]



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).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

e. Emission Limitation:

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.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

g) Miscellaneous Requirements

(1) None.



2. P013, Mixer 09 (line 9 henschel mixer)

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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) (PTI #P0118572, issued 04/27/2015)	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.
h.	OAC rule 3745-21-25	See b)(2)f.



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

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

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 a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (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.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (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

[PTI #P0118572]



- (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.

[PTI #P0118572]

- (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.

[PTI #P0118572]

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



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

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

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.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (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.

[OAC rule 3745-77-07(C)(1) and PTI# P0118572]

- (3) The permittee shall submit annual reports that summarize the total actual OC emissions, in tons, from mixing operations. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

- (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:



Effective Date: To be entered upon final issuance

- 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.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI# P0118572]

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

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

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

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 Title V 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

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 Title V permit application (claimed confidential by the applicant)

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

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

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 demonstrated [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].

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

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).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

e. Emission Limitation:

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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

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) (PTI #P0118572, issued 04/27/2015)	1.67lbs organic compounds (OC)/hrand 7.31 tons OC/yr
b.	OAC rule 3745-21-25	See b)(2)a.

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
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OAC rule 3745-21-25(P)(1) and (P)(4)	Recordkeeping requirements
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[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

e) Reporting Requirements

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

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

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

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 Limitation:

1.67lbs OC/hr and 7.31 tons OC/yr from BMC

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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

g) Miscellaneous Requirements

- (1) None.



4. P017, Facility Cleaning Solvents

Operations, Property and/or Equipment Description:

Usage of cleaning solvent at facility.

- 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) (PTI #03-09519, issued 08/13/1997)	See b)(2)a.
b.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a cleaning operation at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)b.
c.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)c.

- (2) Additional Terms and Conditions

- a. The organic compound (OC) emissions from this emissions unit shall not be more than 8.5 tons/year, based upon a rolling, 12-month summation of the monthly OC emissions rates.

- b. 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, Item #2 - For a new or existing cleaning operation.



- c. 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 collect and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all cleanup materials, in pounds [summation of d)(1)b. x d)(1)c. for all cleanup materials]; and
 - e. the rolling, 12-month summation of the monthly OC emission rates, in tons.
 - [OAC rule 3745-77-07(C)(1) and PTI #03-09519]
 - (2) 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):
 - a. Pollutant: methylene chloride
TLV (ug/m3): 174,000
Maximum Hourly Emission Rate (lbs/hr): 1.75 (Stacks FB1, DBF1,FB2 and DFB2)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,000
MAGLC (ug/m3): 4,142
 - [PTI #03-09519]
 - (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 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.

[PTI #03-09519]

- (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.

[PTI #03-09519]

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

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



Effective Date: To be entered upon final issuance

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the limitation on the rolling, 12-month summation of OC emissions was exceeded. All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-09519]

- (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 #2 - For a new or existing cleaning operation.
 - 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, Item 1, for compliance reports.

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

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

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

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

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:
8.5 tons OC per rolling, 12-month period



Draft Title V Permit
Bulk Molding Compounds, Inc.
Permit Number: P0116259
Facility ID: 0387040001

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation based upon the record keeping requirements established in section d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-09519]

g) Miscellaneous Requirements

(1) None.



5. P023, Mixer 05 (100+ gallon mixer)

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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
	OAC rule 3745-31-05(A)(3) (PTI #03-296, issued 10/27/1975)	See b)(2)a.
a.	OAC rule 3745-17-11(B)	4.1 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-08(B)	none [See b)(2)b.]
d.	OAC rule 3745-17-07(B)	none[See b)(2)c.]
e.	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.
f.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)e.
g.	OAC rule 3745-21-25	See b)(2)f.

(2) Additional Terms and Conditions

a. No limits, pursuant to OAC rule 3745-31-05, were established in PTI 03-00296 for this emissions unit.

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.



Effective Date: To be entered upon final issuance

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

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

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 a minor permit modification.

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



Effective Date: To be entered upon final issuance

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

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

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

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.

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

- (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.



Effective Date: To be entered upon final issuance

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

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

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

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

f) Testing Requirements

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

a. Emission Limitation:

4.1 lbs PE/hr

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)(10).

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

b. 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).

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

g) Miscellaneous Requirements

- (1) None.



6. P025, Mixer 06 (150 gallon mixer)

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

- 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) (PTI #P0104076, issued 04/29/2009)	0.15 pound particulate emissions (PE)/hour, 0.66 ton PE/year 1.88 pounds organic compounds (OC)/hour, 7.3 tons OC/year Visible PE shall not exceed 0% opacity, as a six-minute average.
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	See b)(2)a.
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)b.
e.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)c.
f.	OAC rule 3745-114 ORC 3704.03(F)	See d)(2) - d)(4).
g.	OAC rule 3745-21-25	See b)(2)f.

- (2) Additional Terms and Conditions

- a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



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

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

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 a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #P0104076]

- (2) The permit to install for emissions unit P025 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. 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 (mg/m³): 213.0
Maximum Hourly Emission Rate (lbs/hr): 1.88
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2504.0
MAGLC (ug/m³): 5071.0

[PTI #P0104076]

- (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.

[PTI #P0104076]



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- (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.

[PTI #P0104076]

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

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

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

- (6) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification of each type of bulk molding compound mixed;
 - b. the number of batches mixed;
 - c. the total OC emissionrate for mixing operations, in pounds per month, using the established emission factor of 0.94 lb OC/batch or as derived from the most recent stack test on this emissions unit or similar mixer, calculated as follows:
 - i. (batches of material mixed) x (0.94 lb OC/batch) = lbs OC/month; and
 - d. the annual, year-to-date total OC emissions [summation of d)(6)b. for each calendar month-to-date from January to December).

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

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:



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- 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0104076]

(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.

[OAC rule 3745-77-07(C)(1), PTI #P0104076, and 40 CFR Part 63, Subpart WWWW]

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

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

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

f) Testing Requirements

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



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a. Emission Limitations:

0.15 lb PE/hour, 0.66 tons PE/year

Applicable Compliance Method:

To determine the actual maximum particulate 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 emission rate (lbs/hr)

EF = 6.0 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 95 percent)

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

** from company material balance calculations

The annual emission limitation was developed by multiplying the pound/hour emission limitation by the maximum operating schedule of 8,760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0104076]

b. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with U.S. EPA Method 9, which is located in 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0104076]

c. Emission Limitation:

1.88 pounds OC/hour; 7.3 tons OC/year

Applicable Compliance Method:

The potential to emit for this emissions unit was based on a maximum production capacity of two batches per hour times a "worst case" emissions factor of 0.94 lb OC/batch. The emissions factor of 0.94 lb OC/batch was established based on



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stack testing of similar emissions units. If required, the permittee shall demonstrate compliance with the hourly emissions limitation by testing in accordance with Methods 1 – 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The permittee shall construct a temporary enclosure around this emissions unit during the test to capture any emissions which are not vented through the baghouse stack.

Compliance with the annual emission limitation shall be demonstrated based upon term d)(6).

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

g) Miscellaneous Requirements

- (1) None.



7. P026, ETR-018 & ETR-012

Operations, Property and/or Equipment Description:

Extruder used to form bulk molding compounds manufactured in Mixer #20.

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) (PTI #P0105003, issued 06/10/2009)	3.30 lbs organic compounds (OC)/hour, 14.45 tons OC/year See b)(2)a.
b.	OAC rule 3745-21-25	See b)(2)b.

(2) Additional Terms and Conditions

a. The potential to emit for this emissions unit is 14.45 tons of OC per year based on a maximum hourly emissions rate of 3.30 lbs per hour (as determined by the stack test data of a similar source).

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

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

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

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

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

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

e) Reporting Requirements

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

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

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

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:

3.30 pounds OC/hour, 14.45 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.



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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.

[OAC rule 3745-77-07(C)(1) and PTI #P0105003]

g) Miscellaneous Requirements

(1) None.



8. P027, Mixer 03 (600 liter mixer)

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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) (PTI #P0118572, issued 04/27/2015)	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)
g.	OAC rule 3745-21-25	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. 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.
- g. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

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

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 a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

- (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/m3): 85,202

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

Predicted 1-Hour Maximum Ground-Level Concentration (g/m3): 78.56

MAGLC (g/m3): 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.

[PTI #P0118572]

- (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;



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- 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.

[PTI #P0118572]

- (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.

[PTI #P0118572]

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

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

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

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:



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- 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

(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.

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

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

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

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



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. Emissions 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 shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

b. Emissions 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]



c. Emissions 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").

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

g) Miscellaneous Requirements

(1) None.



9. P028, ETR-026 (processall extruders)

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) (PTI #P0118572, issued 04/27/2015)	1.67 pounds organic compounds (OC)/hour; 7.31 tons OC/year
b.	OAC rule 3745-21-25	See b)(2)a.

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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

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

e) Reporting Requirements

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

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

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

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. Emissions Limitations:

1.67 pounds OC/hour and 7.30 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

g) Miscellaneous Requirements

- (1) None.



10. P029, Mixer 04 (75 gallon mixer)

Operations, Property and/or Equipment Description:

75 gallon mixer, weigh out hopper, filler holding tank, 2 resin day tanks, 2 drum stations, minors weigh out 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 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) (PTI #P0118572, issued 04/27/2015)	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.
f.	OAC rule 3745-21-25	See b)(2)h.



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

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

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.



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- 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 a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

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

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

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

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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

- (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:



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- 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.

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

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

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

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

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. Emissions Limitations:

0.02 grain PM10/dscf; 1.49 tons PM10/yr

- a. 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 shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

b. Emissions 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

c. Emissions 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").

[OAC rule 3745-77-07(C)(1) and PTI #P0118572]

g) Miscellaneous Requirements

(1) None.



11. Emissions Unit Group -A: P030,P031,

EU ID	Operations, Property and/or Equipment Description
P030	(Mixer 1) - 75 gallon mixer, weigh-out hopper, (2) resin day tanks, (2) drum stations, minors weigh-out station and one conveyor
P031	(Mixer 2) - 75 gallon mixer, weigh-out hopper, (2) resin day tanks, (2) drum stations, minors weigh-out station and one conveyor

- 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(F) (PTI #P0117018, issued 07/03/2014)	0.02 grains particulate matter 10 microns or less in size (PM10) per dry standard cubic foot (dscf). 1.49 tons PM10/year Visible particulate emissions (PE) shall not exceed 0% opacity, as a 6-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0117018, issued 07-03-2014)	1.67 lbs volatile organic compounds (VOC)/hr and 7.31 tpy VOC. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit(s) is a mixer at an existing BMC manufacturing facility, subject to the work practice	See b)(2)f.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	standards specified in this section.]	
g.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)g.
h.	OAC rule 3745-21-25	See b)(2)h.

(2) Additional Terms and Conditions

a. The permittee has requested voluntary allowable emission limitations of 0.02 grains PM10/dscf and 1.49 tons PM10/year. The short-term (gr/dscf) and long-term (tons/year) emission limitations for PM10 are being established as practically and legally enforceable requirements based on the use of a baghouse meeting a maximum outlet concentration of 0.02 gr PM10/dscf.

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

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

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit is less than ten tons per year taking into consideration the practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F).

d. The mass emission limitation specified by this rule is less stringent than the mass emission limitation established pursuant to OAC rule 3745-31-05(F).



- e. The visible PE limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(F).
- 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(s) 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.
- h. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

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

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 a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #P0117018]



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

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

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

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 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0117018]

- (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(s) 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(s) 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(s) 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.



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

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

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

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

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 and 1.49 tons PM₁₀/yr

Applicable Compliance Method:

The short term emission limitation was established in accordance with the maximum outlet grain loading concentration for the baghouse.

If required, compliance with the maximum outlet concentration shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201, 201A 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 baghouse outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow rate (1980 dscfm) contributed from this emissions unit(s) to the baghouse, and then by the following conversion factors in order to convert to tons per year: (1 lb/7000 grains x 60 minutes/hour x 8760 hours/year x 1 ton/2000 lbs). Therefore, provided compliance is demonstrated with the performance standard of 0.02 gr PE/dscf, compliance with the annual limitation shall also be demonstrated.

If required, demonstration of the maximum volumetric air flow rate(s) shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #P0117018]

b. Emission Limitations:

1.67 lbs VOC/hr and 7.31 tpy VOC



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.

[OAC rule 3745-77-07(C)(1) and PTI #P0117018]

c. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0117018]

g) Miscellaneous Requirements

- (1) None.