



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

12/18/2015

Vinod Shah  
 Continental Structural Plastics  
 255 Rex Blvd.  
 Auburn Hills, MI 48326

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0388000002  
 Permit Number: P0119447  
 Permit Type: Administrative Modification  
 County: Wyandot

Certified Mail

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

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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



**Response to Comments**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002

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

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

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

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

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



## Response to Comments

Facility ID:	0388000002
Facility Name:	Continental Structural Plastics
Facility Description:	Finished molded fiberglass reinforced plastic parts.
Facility Address:	2915 County Road 96 Carey, OH 43316 Wyandot County
Permit:	P0119447, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Daily Chief-Union on 10/30/2015. The comment period ended on 11/29/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

PDF copies of the original comments in the format submitted are available upon request.

- COMPANY COMMENT:**  
 Under Monitoring and/or Recordkeeping Requirements item d)(2)a. (page 16): We propose to delete this as our system is designed in such a way that: If temperature falls under 50 degrees F (1450 degrees F) from required RTO (test) temperature (1500 degrees F), it would trigger the alarm and the RTO and the paint booth system will shut down.

**AGENCY RESPONSE:**  
 Since the comment submission, the company has also submitted some additional technical specifications information. Upon further examination of this proposal, the agency does not concur with the company that the described system design can replace the monitoring, record keeping, and reporting requirements for oxidizer temperature. The permit will therefore remain unchanged.

- COMPANY COMMENT:**  
 Under Monitoring and/or Recordkeeping Requirements items d)(3)e and d)(4)e. (page 17): That 0.05 reduction efficiency cannot be a fixed number. For example, if thermal destruction efficiency was 98 % with 100% capture, that 0.05 needs to be 0.02. If overall capture efficiency is 97%, that 0.05 should be 0.03 and so on. Clarification is needed.



**Response to Comments**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002

**AGENCY RESPONSE:**

The permit has been changed as suggested, to clarify that values established during the latest performance testing should be used, rather than be restricted to any pre-determined 'fixed' values.



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Continental Structural Plastics**

Facility ID:	0388000002
Permit Number:	P0119447
Permit Type:	Administrative Modification
Issued:	12/18/2015
Effective:	12/18/2015





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Continental Structural Plastics

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. Federally Enforceable Standard Terms and Conditions .....	4
2. Severability Clause .....	4
3. General Requirements .....	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting .....	6
6. Compliance Requirements .....	6
7. Best Available Technology .....	7
8. Air Pollution Nuisance .....	8
9. Reporting Requirements .....	8
10. Applicability .....	8
11. Construction of New Sources(s) and Authorization to Install .....	8
12. Permit-To-Operate Application .....	9
13. Construction Compliance Certification .....	10
14. Public Disclosure .....	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	10
16. Fees.....	10
17. Permit Transfers .....	10
18. Risk Management Plans .....	10
19. Title IV Provisions .....	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions .....	13
1. R009, Downdraft Main Paint Booth .....	14





**Final Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002  
**Effective Date:** 12/18/2015

## Authorization

Facility ID: 0388000002  
Facility Description: Finished molded fiberglass reinforced plastic parts.  
Application Number(s): A0054155  
Permit Number: P0119447  
Permit Description: Administrative modification, to revise BAT determination for oxidizer destruction efficiency  
Permit Type: Administrative Modification  
Permit Fee: \$100.00  
Issue Date: 12/18/2015  
Effective Date: 12/18/2015

This document constitutes issuance to:

Continental Structural Plastics  
2915 County Road 96  
Carey, OH 43316

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

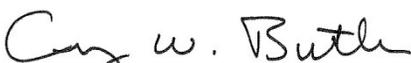
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002  
**Effective Date:** 12/18/2015

## Authorization (continued)

Permit Number: P0119447

Permit Description: Administrative modification, to revise BAT determination for oxidizer destruction efficiency

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

<b>Emissions Unit ID:</b>	<b>R009</b>
Company Equipment ID:	Downdraft Main Paint Booth
Superseded Permit Number:	03-13552
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002  
**Effective Date:** 12/18/2015

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

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

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

## **2. Severability Clause**

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

## **3. General Requirements**

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

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

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

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

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

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

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

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

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

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

## **7. Best Available Technology**

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

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**10. Applicability**

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

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

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

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

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

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

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

## 12. Permit-To-Operate Application

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

**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



**Final Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002  
**Effective Date:** 12/18/2015

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



**Final Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002  
**Effective Date:** 12/18/2015

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



**Final Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0119447  
**Facility ID:** 0388000002  
**Effective Date:** 12/18/2015

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

**1. R009, Downdraft Main Paint Booth**

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

Downdraft main paint booth

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Use of water wash system  7.60 lbs particulate emissions (PE) /hr, 33.3 tons PE /year  See b)(2)c.
b.	OAC rule 3745-31-05(D)	<u>Coating Operations:</u> 5.75 lbs organic compounds (OC) /hr  25.2 tons OC per rolling, 12-month period  <u>Clean-up Operations:</u> 378 lbs OC /month  2.27 ton OC per rolling, 12-month period  See b)(2)a.
c.	40 CFR Part 63, Subpart PPPP 40 CFR 63.4480 et seq.  [In accordance with 40 CFR 63.4481 (a) and (b) and 40 CFR 63.4482(a), (b), and (e), this emissions unit is an existing plastic parts coating operation subject to the emissions limitations/control measures specified in Subpart PPPP. [See b)(2)d. and b)(2)e.]	0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emissions per kg (lb) coating solids used during each 12-month compliance period ['general use coating' category]  See b)(2)b, c)(3), d)(6), and e)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR 63.1-15 [40 CFR 63.4501]	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
e.	OAC rule 3745-17-07(A)	Visible PE from the stack servicing this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(C)	See b)(2)d.
g.	OAC rule 3745-21-07(M)(2)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting Potential to Emit (PTE) to avoid Prevention of Significant Deterioration (PSD) applicability. The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:
  - i. 5.75 pounds OC per hour, for coating operations
  - ii. 25.2 tons OC per rolling 12-month period, for coating operations
  - iii. 378 pounds OC per month, for clean-up operations
  - iv. 2.27 ton OC per rolling 12-month period, for clean-up operations

[Note: Establishing PTE for OC effectively limits PTE for VOC.]
- b. The permittee may use any of the three compliance options [40 CFR 63.4491(a), (b), or (c)], as described in 40 CFR 63.4491; however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]
- c. The requirements established under OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).
- d. Pursuant to OAC rule 3745-17-11(C)(3), this emission unit is exempt from the requirements otherwise under OAC rule 3745-17-11(C).
- e. The requirements of OAC 3745-21-07(M)(2) are less stringent than the control requirement established under OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. this emissions unit shall be equipped with an emissions capture system and thermal oxidizer, designed and operated to achieve a minimum overall control efficiency of 95 percent for organic compounds, with a minimum destruction efficiency of 95 percent for organic compounds.
- (2) The permittee shall operate the water wash system whenever this emissions unit is in operation.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP, including the following sections:

<b>Subpart PPPP section</b>	<b>Subpart PPPP requirement</b>
63.4492, 63.4493, 63.4500	operating limits; work practice standards; requirement for startup, shutdown, and malfunction plan

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- (2) The permittee shall collect and record the following information for each day:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (3) The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;

- d. the uncontrolled OC emission rate for each coating [d)(3)b x d)(3)c], in pounds;
- e. the total control device outlet OC emission rate for all coatings { [summation of d)(3)d] x CE\* x [1 - DRE\*] }, in pounds or tons;
- f. the total fugitive (uncaptured) OC emissions for all coatings { [summation of d)(3)d] x (1 - CE\*) }
- g. the total controlled OC emissions rate for all coatings [d)(3)e + d)(3)f]; and
- h. the rolling 12-month OC emission rate for coatings [rolling 12-month total of d)(3)f, in tons].

\* CE (capture efficiency) and DRE (destruction /removal efficiency), as determined during the most recent performance testing

- (4) The permittee shall collect and record the following information each month for all clean-up materials employed in this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material, as applied, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the uncontrolled OC emission rate for each cleanup material [d)(4)b x d)(4)c], in pounds;
  - e. the total control device outlet OC emission rate for all cleanup materials { [summation of d)(4)d] x CE\* x [1 - DRE\*] }, in pounds or tons;
  - f. the total fugitive (uncaptured) OC emissions for all cleanup materials { [summation of d)(4)d] x (1 - CE\*) }
  - g. the total controlled OC emissions rate for all cleanup materials [d)(4)e + d)(4)f]; and
  - h. the rolling 12-month OC emission rate for cleanup materials [rolling 12-month total of d)(4)f, in tons].

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

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

- (5) The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.

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

Subpart PPPP section	Subpart PPPP requirement
63.4530	Requirement to keep data and information specified.
63.4531	Format for records and length of time to keep records.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in e)(1)a or e)(1)b where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(1)a or e)(1)b where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in e)(1)a or e)(1)b where proper records were not maintained for the investigation and/or the corrective action(s).
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. 5.75 tons VOC per rolling 12-month period, for coating;
    - ii. 2.27 tons VOC per rolling 12-month period, for clean-up;
    - iii. any daily record showing that the water wash/curtain system was not in service or not operated according to manufacturer's recommendations

(with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

Subpart PPPP section	Subpart PPPP requirement
63.4510	Requirement to submit notifications, including initial notification and notification of compliance status.
63.4520	Requirement to submit semiannual compliance reports; performance test reports; and startup, shutdown, and malfunction reports.

f) Testing Requirements

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

- a. Emission Limitation:  
5.75 pounds OC/hour from coating operations

Applicable Compliance Method:

The permittee has demonstrated compliance with the hourly allowable OC limitation based on the results of emission testing conducted on June 3, 2003, on June 20, 2007, and on April 28, 2015.

If required, the permittee shall demonstrate compliance with the hourly OC emissions rate in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

- b. Emission Limitation:  
25.2 tons OC per rolling 12-month period, for coating operations  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in d)(3).
  - c. Emission Limitation:  
378 lbs OC /month, for clean-up operations  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in d)(4).
  - d. Emission Limitation:  
2.27 tons OC per rolling 12-month period, for clean-up operations  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in d)(4).
  - e. Emission Limitation:  
minimum overall control efficiency of 95 percent for organic compounds, with a minimum destruction efficiency of 95 percent for organic compounds.  
  
Applicable Compliance Method:  
The permittee has demonstrated compliance with the overall control efficiency and destruction efficiency requirements based on the results of emission testing conducted on April 28, 2015.  
  
If required, the permittee shall demonstrate compliance with the 95 percent overall control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A; and 40 CFR Part 51, Appendix M, Method 204, or other applicable US EPA -approved methods.
  - f. Emission Limitation:  
0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emissions per kg (lb) coating solids used during each 12-month compliance period [‘general use coating’ category]  
  
Applicable Compliance Method:  
Compliance shall be based on compliance option under b)(2)b and on the record keeping requirements under d)(6).
- g) Miscellaneous Requirements
- (1) None.