Ohio Environmental Protection Agency

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

1/26/2016

Certified Mail

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

Facility ID: 0387000042
Permit Number: P0119958
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 Sentenil-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,

Michael E. Hopkins,P.E
Assistant Chief, Permitting 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
Continental Structural Plastics
100 South Poe Road, P.O. Box 277, North Baltimore, OH 45872
ID#: P0119958
Date of Action: 1/26/2016
PermitDesc: Renewal Title V operating permit for a molded fiberglass reinforced plastics parts manufacturer..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0387000042
Facility Name:	Continental Structural Plastics
Facility Description:	Molded fiberglass reinforced plastics parts manufacturer
Facility Address:	100 South Poe Road, North Baltimore, OH 45872
Permit #:	P0119958, Renewal

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

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

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes.
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	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)	Incorporated insignificant EU B015 and R036 (PTI P0116829) into Facility Wide Terms and Conditions. Incorporated significant EU's P812 & P813 (PTI P0116523), and P823 (PTI P0119240).
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes	Incorporated insignificant EU B015 and R036 (PTI P0116829) into Facility Wide Terms and Conditions. Incorporated significant EU's P812 & P813 (PTI P0116523), and P823 (PTI P0119240).

to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	Removed emissions units R001, R003, P028, P030, and B002. Incorporated the terms of 40 CFR Part 63 Subpart DDDDD for emissions units B001, B003, B014 and B015.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	R012, R013, R014 and R015.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1.	77-07(C)		List facility-wide terms and conditions which are enforceable under state law only.
B.2		40 CFR Part 63	Incorporation of the terms of 40 CFR part 63 Subpart PPPP for the applicable insignificant emissions units.
B.3	77-07(A)(13)		Lists insignificant emission units that have one or more applicable requirements.
B.4		40 CFR Part 63	Incorporation of the terms of 40 CFR part 63 Subpart DDDDD for the applicable insignificant emissions units.
B.5		40 CFR Part 64	List emissions units subject to compliance assurance monitoring.

C. Emissions Unit Terms and Conditions

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

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P823			31-05(A)(3)	N	N	N	N	N	N	N	N	N	M/R/Rp/ET- BAT has been determined to be compliance with the MACT. Therefore, M/R/Rp/ET requirements are established pursuant to 40 CFR, Part63, Subpart WWWW.
P823	SMC Operations: 2.0 lbs OC/hr; 38.60 tons OC per rolling 12 month period* SMC Scrap: 37.10 tons OC per rolling 12 month*	31-05(D)		N	Y	Y	N	Y	Y	N	N	N	OR- Annual SMC usage & scrap generation; M, R, & R in place. ET- Calculation from emission factor from M,R, & R used for compliance. * SMC Operations and Scrap Generation for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823 combined CAM does not apply, emissions unit is uncontrolled.
P812 P813 P823	none	21-25		N	N	Y	N	Y	Y	N	N	N	
P812 P813 P823	none		40 CFR Part 63*	N	N	Y	N	Y	Y	N	N	N	*40 CFR Part 63, Subpart WWWW
P901	0.77 lbs PE /hr, 3.37 tons /yr, 0.004 gr /DSCF		31-05	N	N	Y	N	Y	Y	N	N	N	ET - None - per Ohio EPA Engineering Guide 16 (from the baghouse stacks) CAM does not apply, UMRE is less than the threshold.
P901	2.15 tons PE /yr *		31-05	N	N	Y	N	Y	Y	N	N	N	M - Visible emissions checks. Daily was chosen as a reasonable and practical monitoring frequency. ET - None - per Ohio EPA Engineering Guide 16 * fugitive emissions
P901	20% opacity	17-07(A)		N	N	Y	N	Y	Y	N	N	N	M - Daily visible emissions checks.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													ET - None normally required for opacity alone. (from the baghouse stacks)
P901	N/A N/A	17-08 (B) 17-07 (B)		N	Y	N	N	N	N	N	N	N	ND - The emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B). ND - This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
P009 P010 P013 P014 P019 P027 P031 P033	1.26, 4.20 1.26, 4.20 1.05, 3.75 0.98, 3.60 1.75, 5.25 1.05, 3.75 2.59, 7.05 2.04, 5.87 * see note		31-05	N	N	N	N	Y	Y	N	N	N	ET - None - Calculation from emission factor from MR&R used as compliance determination. * Note: figures in Limitation column are by the corresponding emissions unit in EU column and are : first number is pounds OC per hour, and second number is tons OC per year CAM does not apply, emissions unit is uncontrolled.
P009 P010 P013 P014 P019 P027 P031 P033	38.6 ton OC /yr * 37.1 ton OC /yr *	31-05(D)		N	Y	N	N	Y	Y	N	N	N	OR - Sheet molding compound usage restriction ET - None - Calculation from emission factor from MR&R used as compliance determination. * per rolling 12-month period, for all emissions units combined 38.6 ton OC /yr - for the compression molding 37.1 ton OC /yr - for SMC scrap generation
P009 P010 P013 P014 P019 P027 P031	OR- See Comments		40 CFR Part 63*	N	Y	N	N	N	N	N	N	N	Work practice requirement to: uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. * 40 CFR 63 Subpart WWWW Table 4

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P033													
P034 P035	2.75 lb OC/hr, 7.25 ton OC/yr *		31-05	N	N	N	N	Y	Y	N	N	N	ET - None - Calculation from emission factor from MR&R used as compliance determination. CAM does not apply, emissions unit is uncontrolled. * each emissions unit
P812, P813			31-05(A)(3)	N	N	N	N	N	N	N	N	N	M/R/Rp/ET- BAT has been determined to be compliance with the MACT. Therefore, M/R/Rp/ET requirements are established pursuant to 40 CFR, Part63, Subpart WWWW.
P812, P813	SMC Operations: P812: 0.59 lb OC/hr P813: 0.59 lb OC/hr 38.60 tons OC per rolling 12 month* 37.10 tons OC per rolling 12 month*	31-05(D)											OR- Annual SMC usage & scrap generation; M, R, & R in place. ET- Calculation from emission factor from M,R, & R used for compliance. * SMC Operations and Scrap Generation for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823 combined CAM does not apply, emissions unit is uncontrolled.
R012 R013 R014 R015	10.3 lb OC /hr; 45.1 ton OC /yr *		31-05	N	N	Y	N	Y	Y	N	N	N	ET - None - per Ohio EPA Engineering Guide 16 CAM applies, units are controlled by an RTO. Combustion temperature is the indicator.
R012 R013 R014 R015	124 tons OC /yr *		31-05	N	N	Y	N	Y	Y	N	N	N	* * per rolling 12-month period, for all emissions units combined
R012 R013	85% overall OC	21-07 (M)(2)	31-05	N	N	Y	N	Y	Y	N	N	N	ET - None - per Ohio EPA Engineering Guide 16

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
R014 R015	reduction, 90% OC destruct												
R012 R013 R014 R015	0.28 lb PE /hr; 1.23 ton PE /yr		31-05	N	N	Y	N	Y	Y	N	N	N	ET - None - per Ohio EPA Engineering Guide 16 CAM does not apply, UMRE is less than the threshold.
R012 R013 R014 R015	0% opacity		31-05	N	N	Y	N	Y	Y	N	N	N	ET - None normally required for opacity alone.
R012 R013 R014 R015	See comments	17-11 (C)		N	Y	Y	N	Y	Y	N	N	N	OR - Operational and maintenance standards for water curtain.
R012 R013 R014 R015	0.16 lb HAP per lb coating solids		40 CFR 63. 4480 (b)	N	N	Y	N	Y	Y	N	N	N	ET - None - Mass balance from MR&R used as compliance determination.
R012 R013 R014 R015	See comments		40 CFR 63.1 et seq.	N	N	N	N	Y	Y	N	N	N	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.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Continental Structural Plastics

Facility ID:	0387000042
Permit Number:	P0119958
Permit Type:	Renewal
Issued:	1/26/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Continental Structural Plastics

Table of Contents

Authorization 1

A. Standard Terms and Conditions 2

1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 12
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 13
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 16
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 21
1. P823, Press #13 22
2. P901, Secondary Finishing Operations 29
3. Emissions Unit Group - Group A - (Compression) Molding Presses: P009, P010, P013, P014, P019, P027, P031, and P033 34
4. Emissions Unit Group - Group B - (Compression) Molding Presses: P034 and P035 42
5. Emissions Unit Group - Compression Molding Presses: P812 and P813 51
6. Emissions Unit Group - Group D - coating operations: R012, R013, R014, R015, ... 59

Authorization

Facility ID:	0387000042
Facility Description:	Molded fiberglass reinforced plastics parts manufacturer
Application Number(s):	M0003622, A0054415
Permit Number:	P0119958
Permit Description:	Renewal Title V operating permit for a molded fiberglass reinforced plastics parts manufacturer.
Permit Type:	Renewal
Issue Date:	1/26/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0118081

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

Continental Structural Plastics
100 South Poe Road
P.O. Box 277
North Baltimore, OH 45872

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

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

c) The permittee shall submit required reports in the following manner:

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

23. Title VI Provisions

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

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest District Office.

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

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

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

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

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

28. Permit Transfers

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

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

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

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

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following rule is applicable to this facility: National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR 63.4480 etseq]. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   a) The permittee shall comply with the applicable emission limitation of 40 CFR 63 Subpart PPPP as set forth in B.2.c) and B.2.d).

   b) The following is the list of the emissions units at this facility that are 'existing affected sources' subject to 40 CFR 63.4480 et seq. (Subpart PPPP):

      (1) significant emissions units R012, R013, R014, and R015

      (2) insignificant emissions units R016 and R036.

      (3) all other 'affected sources' (existing or new) at the facility, as defined in 40 CFR 63.4482(b)

   c) The options for compliance when using more than one type of coating is described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

   d) The permittee has elected to use the compliance option provided by 40 CFR 63.4491(a) - compliant material option. This is accomplished by demonstrating that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.4490, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, 63.4541, and 63.4542 to demonstrate compliance with the applicable emission limit using this option.

      The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491; however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]

   e) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 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.

f) The permittee shall comply with the applicable reporting requirements required under 40 CFR 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.

g) The permittee shall comply with the applicable compliance requirements under 40 CFR 63 Subpart PPPP, including sections 63.4491, and 63.4540 through 63.4568.

h) The permittee shall comply with the following miscellaneous requirements: Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

[OAC 3745-77-07(C)(1) and 40 CFR 63 Subpart PPPP]

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

EU ID	**Operations, Property and/or Equipment Description**
B001	Boiler #1 (natural gas/propane back-up) for steam generation - 4.184 MMBtu/hr input
B003	Boiler #3 (natural gas/propane back-up) for steam generation - 7.323 MMBtu/hr input
B007	Air Make Up #4 - 6.318 MMBTU/hr input (Café Main Building)
B012	Air Make Up #9 - 5.280 MMBTU/hr input (Paint Room)
B014	Small Boiler #4 in skimmer area 1.96 MM BTU/Hour input
B015	Boiler #2 (natural gas/propane back-up) for steam generation - 9.414 MMBtu/hr input
P003	HV Vacuum Producer & Tubular Baghouse #1 & #2 - Fiberglass Molding Finishing Area
P004	Oven #2 - Paint Finish System Oven
P006	Primer System Dry Off Oven (PTI 03-13809 issued September 24, 2002)
P007	Bake Oven - Primer System Bake Oven (PTI 03-13809 issued September 24, 2002)
P008	Parts Washer - Six stage heated (natural gas/propane back-up) plastic part washer
R016	Facility-wide Paint Touch-Up Areas - Final inspection and touch up of painted parts
R036	Spray Booth (1 gallon per hour maximum application rate) with associated Dry-Off Oven (PTI P0116829 issued May 15, 2014)

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

4. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District office or local air agency. The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) boilers by January 31, 2013, or upon startup, whichever is later; and the facility's existing boilers shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016.

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

EU ID	Operations, Property and/or Equipment Description
B001	Boiler #1 (natural gas/propane back-up) for steam generation - 4.184 MMBtu/hr input
B003	Boiler #3 (natural gas/propane back-up) for steam generation - 7.323 MMBtu/hr input
B014	Small Boiler #4 in skimmer area 1.96 MM BTU/Hour input
B015	Boiler #2 (natural gas/propane back-up) for steam generation - 9.414 MMBtu/hr input

   [OAC 3745-77-07(A)(13), and 40 CFR 63 Subpart DDDDD

5. Pursuant to 40 CFR, Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units R012, R013, R014 and R015 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.
   [40 CFR, Part 64]

C. Emissions Unit Terms and Conditions

1. P823, Press #13

Operations, Property and/or Equipment Description:

Compression Molding Press

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective June 30, 2008 (PTI P0119240 issued October 1, 2015)	TheBest Available Technology (BAT) requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 63, Subpart WWWW. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008 (PTI P0119240 issued October 1, 2015)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b.
c.	OAC rule 3745-31-05(D) (PTI P0119240 issued October 1, 2015)	<u>SMC operations:</u> 2.00 lbs organic compounds* (OC)/hr 38.60 tons OC* per rolling, 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813 and P823, combined [See b)(2)c.] <u>SMC scrap generation:</u> 37.10 tons OC* per rolling, 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813 and P823,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined [See b)(2)c. and b)(2)d.] *All OC emissions are considered to be VOC emissions.
d.	OAC rule 3745-21-25	See b)(2)e., d)(3) and e)(2).
e.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5785-5935) [In accordance with 40 CFR 63.5790(b), these emission units are an existing 'closed molding' affected source subject to the emission limitations / control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)f. See b)(2)g., d)(4), e)(3), and f)(2).
f.	40 CFR 63.1-15 (40 CFR 63.6013)	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.

(2) Additional Terms and Conditions

a. This BAT emission limit applies until U.S EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(iii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823. The federally enforceable emission limitations are based on SMC and SMC scrap generation usage restrictions [see c)(1) and c)(2)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

d. All emissions from SMC scrap generation are considered fugitive.

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

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

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

g. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

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

Note: The Table 2 dates have passed, and it has been determined that the permittee has achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 37,100,000 lbs of non-preheated SMC; and

c. 37,100,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling, 12-month summation of the monthly SMC input rates.
[OAC 3745-77-07(A)(1) and PTI P0119240]

(2) The maximum annual scrap generation for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
[OAC 3745-77-07(A)(1) and PTI P0119240]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.
[OAC 3745-77-07(A)(1) and PTI P0119240]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must

be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.
[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, Table 1 to OAC 3745-21-25 and PTI P0119240]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 38.60 tons per rolling 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a. + d)(1)b.], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations:

OC emissions (preheated) = [lbs/month, from d)(1)b.] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a.] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a.]; preheated [from d)(1)b.]; and total (preheated and non-preheated) [from d)(1)c.] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d.], in tons.

*Emission factors supplied by permittee and based on laboratory testing.
[OAC 3745-77-07(C)(1) and PTI P0119240]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c. x d)(2)d.], divided by d)(2)b., and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b. x d)(2)e. x 0.40 volatilization factor*], in pounds; and

g. the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.
[OAC 3745-77-07(C)(1) and PTI P0119240]

(3) 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]

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 37,100,000 of non-preheated SMC; and 37,100,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 37,100,000 lbs; and

c. any exceedances of the rolling 12-month OC emissions limitations of: 38.60 tons (for SMC compression molding); and 37.10 tons (for scrap generation).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northwest District Office).
[OAC 3745-77-07(C)(1) and PTI P0119240]

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

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

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

(3) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

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

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

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
2.00 lb OC/hr

<u>Applicable Compliance Method:</u>
The hourly allowable OC emission limitation was established by multiplying the maximum hourly SMC usage rate of 1000lbs/hr) by a worst-case emission factor of 0.002 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and based on laboratory testing.

If required, the permittee shall demonstrate compliance with the hourly emission OC limitation in accordance with Methods 1 – 4 and 18, 25 or 25A, of 40 CFR, Part 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI P0119240]

b. Emission Limitation: (compression molding of SMC)
38.60 tons OC per rolling, 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).
[OAC 3745-77-07(C)(1) and PTI P0119240]

c. Emission Limitation: (SMC scrap generation)
37.10 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).
[OAC 3745-77-07(C)(1) and PTI P0119240]

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

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

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

g) Miscellaneous Requirements

(1) None.

2. P901, Secondary Finishing Operations

Operations, Property and/or Equipment Description:

Secondary finishing (deflashing, sanding, routing, drilling, milling, trimming) operations - with baghouses

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 03-13293 issued November 20, 2001)	0.004 gr particulate emissions (PE)/dscf 0.77 lb PE/hr, 3.37 tons PE/yr [from the baghouse stacks] 2.15 tons fugitive PE/year See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule [from the baghouse stacks]
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-08(A)	See b)(2)d.
e.	OAC rule 3745-17-07(B)	See b)(2)e.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

Best available technology (BAT) for this emission unit has been determined to be use of baghouses with a maximum outlet concentration of 0.004 gr/dscf and the use of best available control measures for fugitive dust control.

b. The permittee shall employ best available control measures on all the PE from secondary finishing operations not captured and controlled by a baghouse system, for the purpose of ensuring compliance with the above mentioned

applicable requirements. Secondary finishing operations shall be contained within facility building (enclosure control) to ensure compliance.

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 facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

f. All PE from the baghouse stack is assumed to be particulate matter 10 microns in diameter or less (PM_{10}).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

e. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13293]

(2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive 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 any visible emission incident; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d.) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13293]

(3) Notwithstanding the frequency of the monitoring requirements specified in d)(1) or d)(2), the permittee may reduce the frequency of visual observations of visible PE required in d)(1) or d)(2) from weekly to monthly readings, if for one full quarter the facility's visual observations indicate no abnormal visible fugitive PE from the egress points associated with this emissions unit. The permittee shall revert to weekly readings for d)(1) or d)(2), as applicable, if any abnormal visible PE from the associated egress points are observed.
[OAC 3745-77-07(C)(1) and PTI 03-13293]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible PE. 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. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-13293]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive PE. 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. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-13293]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation: (from the baghouse stacks)
0.77 lb PE/hr, 3.37 tons PE/yr
0.004 gr PE/dscf

Applicable Compliance Method:
The gr PE/dscf emission limitation was established in accordance with the manufacturer's baghouse specifications. Compliance with the hourly PE limitation may be determined by using the following equation:

PE (baghouse stack) = (ERC) + (NC) + (CC)

ERC = PE from Energy Room Collector baghouse system
ERC = (0.004 gr/dscf)(4800 dscf/min)(60 min/hr)(1 lb/7000 gr)
ERC = 0.16 lb PE/hr

NC = PE from North Collector baghouse system
NC = (0.004 gr/dscf)(8000 dscf/min)(60 min/hr)(1 lb/7000 gr)
NC = 0.27 lb PE/hr

CC = PE from Central Collector baghouse system
CC = (0.004 gr/dscf)(10,000 dscf/min)(60 min/hr)(1 lb/7000 gr)
CC = 0.34 lb PE/hr

PE (baghouse stack) = 0.16 lb PE/hr + 0.27 lb PE/hr + 0.34 lb PE/hr
= 0.77 lb PE/hr

If required, the permittee shall demonstrate compliance with the hourly allowable PE and gr PE/dscf limitations pursuant to Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the hourly limitation by 8760, and dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI 03-13293]

b. Emission Limitation:
2.15 tons fugitive PE/year

Applicable Compliance Method:
Fugitive PE are exhausted through the ventilation system of the building containing the secondary finishing operations. The company-supplied emission factor of 2.04×10^{-8} lb PE/ft^3 was derived from actual testing of the air in the secondary finishing operations building. The annual emission limitation was developed using the company-supplied emission factor, a maximum volumetric

flow rate of 24,000,000 ft^3 per hour from the building ventilation system, a maximum operating schedule of 8,760 hour per year, and dividing by 2000 lbs/ton.

The tons fugitive PE per year emission limitation represents the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.
[OAC 3745-77-07(C)(1) and PTI 03-13293]

c. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule (from the baghouse stacks)

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 3745-77-07(C)(1) and PTI 03-13293]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Group A - (Compression) Molding Presses: P009, P010, P013, P014, P019, P027, P031, and P033

EU ID	Operations, Property and/or Equipment Description
P009	Compression molding of sheet molding compound (SMC)
P010	Compression molding of sheet molding compound (SMC)
P013	Compression molding of sheet molding compound (SMC)
P014	Compression molding of sheet molding compound (SMC)
P019	Compression molding of sheet molding compound (SMC)
P027	Compression molding of sheet molding compound (SMC)
P031	Compression molding of sheet molding compound (SMC)
P033	Compression molding of sheet molding compound (SMC)

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 03-13396 issued May 22, 2001)	SMC operations: P009: 1.26 lbs organic compound (OC)/hour, 4.20 tons OC/year P010: 1.26 lbs OC/hr, 4.20 tons OC/yr P013: 1.05 lbs OC/hr, 3.75 tons OC/yr P014: 0.98 lbs OC/hr, 3.60 tons OC/yr P019: 1.75 lbs OC/hr, 5.25 tons OC/yr P027: 1.05 lbs OC/hr, 3.75 tons OC/yr P031: 2.59 lbs OC/hr, 7.05 tons OC/yr P033: 2.04 lbs OC/hr, 5.87 tons OC/yr See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-13396 issued May 22, 2001) [See also PTI 03-13809 issued September 24, 2002, PTI P0116523 issued May 28, 2014, and PTI P0119240 issued October 1, 2015]	SMC operations: 38.60 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813 and P823, combined [See b)(2)b.] SMC scrap generation:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		37.10 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813 and P823, combined [See b)(2)b. and b)(2)c.]
c.	OAC rule 3745-21-25	See b)(2)d., d)(3) and e)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785-5935) [In accordance with 40 CFR 63.5790(b), these emission units are an existing 'closed molding' affected source subject to the emission limitations / control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)f. See b)(2)e., d)(4), e)(3), and f)(2).
e.	40 CFR 63.1-15 (40 CFR 63.6013)	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.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-25, and 40 CFR Part 63, Subpart WWWW.

b. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823. The federally enforceable emission limitations are based on SMC usage restrictions [see c)(1)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts volatile organic compounds (VOCs).

c. All emissions from scrap generation are fugitive.

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

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

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

f. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

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

Note: The Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 37,100,000 lbs of non-preheated SMC; and

c. 37,100,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling 12-month summation of the monthly SMC input rates.

[OAC 3745-77-07(A)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

(2) The maximum annual scrap generation for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

[OAC 3745-77-07(A)(1) and PTI 03-13396]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines

fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.

[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, and Table 1 to OAC 3745-21-25]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 38.60 tons per rolling 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, P823, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a + d)(1)b], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b.] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a.] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a.]; preheated [from d)(1)b.]; and total (preheated and non-preheated) [from d)(1)c.] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d.], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c. x d)(2)d.], divided by d)(2)b., and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b. x d)(2)e. x 0.40 volatilization factor*], in pounds; and

g. the rolling 12-month summation of the SMC scrap generation, in pounds, and the rolling 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

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

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

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

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 37,100,000 of non-preheated SMC; and 37,100,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 37,100,000 lbs; and

c. any exceedances of the rolling 12-month OC emissions limitations of: 38.60 tons (for SMC compression molding); and 37.10 tons (for scrap generation).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

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

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

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

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

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

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. <u>Emission Limitation:</u>
pounds OC per hour and tons OC per year (compression molding) - as specified for each emissions unit in b)(1)a.

<u>Applicable Compliance Method:</u>
Compliance with the hourly allowable OC emission limitation for each unit may be determined by multiplying the maximum hourly SMC usage rate for that unit (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

* Emission factor supplied by permittee and based on laboratory testing.

Compliance with the annual emission limitation for each unit may be determined as follows:

i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;

ii. multiply the maximum annual usage rate of non-preheated SMC (700,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and

iii. sum f)(1)a.i. and f)(1)a.ii., and then divide by 2000.

[OAC 3745-77-07(C)(1) and PTI 03-13396]

b. Emission Limitation: (compression molding)
38.60 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

c. Emission Limitation: (scrap generation)
37.10 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

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

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

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

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Group B - (Compression) Molding Presses: P034 and P035

EU ID	Operations, Property and/or Equipment Description
P034	Compression molding of sheet molding compound (SMC)
P035	Compression molding of sheet molding compound (SMC)

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)(4), d)(5), and d)(6).

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 03-13809 issued September 24, 2002)	SMC operations: 2.75 lbs organic compound (OC)/hour, 7.25 tons OC/year (from each emissions unit) [See b)(2)a. and b)(2)d.]
b.	OAC rule 3745-31-05(D) (PTI 03-13809 issued September 24, 2002) [See also PTI 03-13396 issued May 22, 2001, PTI P0116523 issued May 28, 2014, and PTI P0119240 issued October 1, 2015]	SMC compression molding: 38.60 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined [See b)(2)b.] SMC scrap generation: 37.10 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined [See b)(2)b. and b)(2)c.]
c.	OAC rule 3745-21-25	See b)(2)e., d)(3) and e)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785-5935)[In accordance with 40 CFR 63.5790(b), these emission units are an existing 'closed molding' affected source subject to the emission limitations / control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)f. See b)(2)g., d)(4), e)(3), and f)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.1-15 (40 CFR 63.6013)	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.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-25, and 40 CFR Part 63 Subpart WWWW.

b. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823. The federally enforceable emission limitations are based on SMC usage restrictions [see c)(1)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

c. All emissions from scrap generation are fugitive.

d. The pounds OC per hr and tons OC per year emission limitations for each emissions unit were established for PTI purposes to reflect the potentials to emit for the emissions units. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

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

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

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

g. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

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

Note: The Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 37,100,000 lbs of non-preheated SMC; and

c. 37,100,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling 12-month summation of the monthly SMC input rates.

[OAC 3745-77-07(A)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

(2) The maximum annual scrap generation for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.

[OAC 3745-77-07(A)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

[OAC 3745-77-07(A)(1) and PTI 03-13809]

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

[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, Table 1 to OAC 3745-21-25 and PTI 03-13089]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 38.60 tons per rolling 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823,

combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a. + d)(1)b.], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b.] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a.] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a.]; preheated [from d)(1)b.]; and total (preheated and non-preheated) [from d)(1)c.] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d.], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c. x d)(2)d.], divided by d)(2)b., and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b. x d)(2)e. x 0.40 volatilization factor*], in pounds; and

g. the rolling 12-month summation of the SMC scrap generation, in pounds, and the rolling 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

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

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

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

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

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

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

(5) The permit to install for this emissions unit group 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 (µg /m3): 85,200
Maximum Hourly Emission Rate (lbs/hour): 5.5*
Predicted 1-Hour Maximum Ground-Level Concentration (µg /m3): 294
MAGLC (µg /m3): 2028

* maximum hourly emission rate was calculated by using the maximum pounds OC per hour from each press plus the average pounds OC per hour emitted from scrap SMC
[PTI 03-13809]

(6) 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 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.).

* Only compounds/pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

[PTI 03-13809]

(7) 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(QQQ)(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 (QQQ)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
[PTI 03-13809]

(8) 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 03-13809]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the combined maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 37,100,000 lbs of non-preheated SMC; and 37,100,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 37,100,000 lbs; and

c. any exceedances of the rolling 12-month OC emissions limitations of: 38.60 tons (for SMC compression molding); and 37.10 tons (for scrap generation).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

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

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

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

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

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

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation: [SMC operations]
2.75 lbs organic compound (OC)/hour, 7.25 tons OC/year (from each emissions unit)

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation for each unit may be determined by multiplying the maximum hourly SMC usage rate for that unit (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

* Emission factor supplied by permittee and based on laboratory testing.

Compliance with the annual emission limitation for each unit may be determined as follows:

i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;

ii. multiply the maximum annual usage rate of non-preheated SMC (700,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and

iii. sum f)(1)a.i. and f)(1)a.ii., and then divide by 2000.
[OAC 3745-77-07(C)(1) and PTI 03-13809]

b. Emission Limitation: (compression molding)
38.60 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

c. Emission Limitation: (scrap generation)
37.10 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).

[OAC 3745-77-07(C)(1), PTI 03-13089, PTI 03-13396, PTI P0116253 and PTI P0119240]

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

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

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

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Compression Molding Presses: P812 and P813

EU ID	Operations, Property and/or Equipment Description
P812	Compression molding of sheet molding compound (SMC) Press #25
P813	Compression molding of sheet molding compound (SMC) Press #26

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/2001 (PTI P0116523 issued May 28, 2014)	TheBest Available Technology (BAT) requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 63, Subpart WWWW. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) (PTI P0116523 issued May 28, 2014) [See also PTI P0119240 issued October 1, 2015]	<u>SMC operations:</u> P812: 0.59 lb organic compounds (OC)/hr* P813: 0.59 lb OC/hr* 38.60 tons OC* per rolling, 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined [See b)(2)c.] <u>SMC scrap generation:</u> 37.10 tons OC* per rolling, 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined [See b)(2)c. and b)(2)d.]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		*All OC emissions are considered to be volatile organic compound (VOC) emissions.
d.	OAC rule 3745-21-25	See b)(2)e., d)(3) and e)(2).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785-5935) [In accordance with 40 CFR 63.5790(b), these emission units are an existing 'closed molding' affected source subject to the emission limitations / control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)f. See b)(2)g., d)(4), e)(3), and f)(2).
f.	40 CFR 63.1-15 (40 CFR 63.6013)	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.

(2) Additional Terms and Conditions

a. 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, then these emission limitations/control measures no longer apply as BAT.

b. 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 these air contaminant sources since the uncontrolled potential to emit of each for VOC is less than 10 tons/year.

c. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823. The federally enforceable emission limitations are based on SMC and SMC scrap generation usage restrictions [see c)(1) and c)(2)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts volatile organic compounds (VOCs).

d. All emissions from SMC scrap generation are considered fugitive.

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

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

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

g. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

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

Note: The Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 37,100,000 lbs of non-preheated SMC; and

c. 37,100,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling, 12-month summation of the monthly SMC input rates.
[OAC 3745-77-07(A)(1) and PTI P0116523]

(2) The maximum annual scrap generation for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
[OAC 3745-77-07(A)(1) and PTI P0116523]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.
[OAC 3745-77-07(A)(1) and PTI P0116523]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.
[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, Table 1 to OAC 3745-21-25 and PTI P0116523]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 38.60 tons per rolling 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a + d)(1)b], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b.] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a.] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a.]; preheated [from d)(1)b.]; and total (preheated

and non-preheated) [from d)(1)c.] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d.], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.
[OAC 3745-77-07(C)(1) and PTI P0116523]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c. x d)(2)d.], divided by d)(2)b., and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b. x d)(2)e. x 0.40 volatilization factor*], in pounds; and

g. the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.
[OAC 3745-77-07(C)(1) and PTI P0116523]

(3) 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]

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 37,100,000 of non-preheated SMC; and 37,100,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 37,100,000 lbs; and

c. any exceedances of the rolling 12-month OC emissions limitations of: 38.60 tons (for SMC compression molding); and 37.10 tons (for scrap generation).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northwest District Office).
[OAC 3745-15-03(B)(1)(a), OAC 3745-15-03(C), OAC 3745-77-07(A)(3)(c), and OAC 3745-77-07(C)(1)]

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

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

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

(3) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

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

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

f) Testing Requirements

(1) 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:
0.59 lb OC/hr, from P812 and P813 individually (compression molding of SMC)

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation for each unit may be determined by multiplying the maximum hourly SMC usage rate for that unit (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and based on laboratory testing.

If required, the permittee shall demonstrate compliance with the hourly emission limitations in accordance with Methods 1 – 4 and 18, 25 or 25A, of 40 CFR, Part 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI P0116523]

b. Emission Limitation: (compression molding of SMC)
38.60 tons OC per rolling, 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).
[OAC 3745-77-07(C)(1) and PTI P0116523]

c. Emission Limitation: (SMC scrap generation)
37.10 tons OC per rolling 12-month period, for emissions units P009, P010, P013, P014, P019, P027, P031, P033, P034, P035, P812, P813, and P823, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).
[OAC 3745-77-07(C)(1) and PTI P0116523]

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

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

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

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -Group D - coating operations: R012, R013, R014, R015,

EU ID	Operations, Property and/or Equipment Description
R012	Primer Spray Booth #1 - with (regenerative) thermal oxidizer
R013	Primer Spray Booth #2 - with (regenerative) thermal oxidizer
R014	Primer Spray Booth #3 - with (regenerative) thermal oxidizer
R015	Primer Spray Booth #4 - with (regenerative) thermal oxidizer

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)(12), d)(13), d)(14), and d)(15).

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 03-13903 issued February 25, 2003)	control requirements [See b)(2)a.] 10.30 pounds OC/hour and 45.10 tons OC/year from the application of coating and clean-up materials (for each emissions unit) [See b)(2)b.] 0.28 pound particulate emissions (PE)/hour and 1.23 tons PE/year (for each emissions unit) Visible PE shall not exceed 0 percent opacity, as a six-minute average. See b)(2)d.
b.	OAC rule 3745-31-05(D)	124.0 tons OC per rolling 12-month period, from emissions units R012, R013, R014, and R015, combined [See b)(2)c.]
c.	OAC rule 3745-21-07(M)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency. Ninety percent or more of the carbon in the organic material shall be incinerated and shall be oxidized to carbon dioxide.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481 (a) and (b) and 40 CFR 63.4482(a), (b), and (e), these emission units are an existing plastic parts coating operation subject to the emissions limitations / control measures specified in Subpart PPPP.] [Note: The OC capture / control system for this unit is not used for compliance with Subpart PPPP. See b)(2)a. and b)(2)j.]	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR 63.4490(a)(1), these emission units currently comply with the 'general use' coating category. For each existing coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.] See b)(2)e. Compliance with the standard of 63.4990 shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)f.
e.	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.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(2) through d)(6), and e)(1)c.
e.	OAC rule 3745-17-11(C)	See b)(2)g.

(2) Additional Terms and Conditions

a. The permittee shall employ best available technology (BAT) control requirements on these emissions units. BAT has been determined to be the use of a regenerative thermal oxidizer which meets the requirements of OAC rule 3745-21-07(G)(2) and (G)(6) as those rules existed at the time of the PTI issuance, which are now equivalent to the requirements in OAC rule 3745-21-07(M)(2).

b. The OC emission limitations of 10.3 pounds per hour and 45.1 tons per year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum OC content of each coating and the

control efficiency of the regenerative thermal oxidizer control device. The PE limitations of 0.28 pound per hour and 1.23 tons per year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum solids content (weight percent) of each coating, the transfer efficiency of the coating (35 percent) and the control efficiency of the baffles/waterwash PE control system (99 percent). Therefore, it is not necessary to establish record keeping or reporting requirements to demonstrate compliance with these limitations.

c. The permittee has requested a federally enforceable limitation of 124.0 tons OC per rolling 12-month period, from emissions units R012, R013, R014, and R015, combined, for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

d. The requirements of this rule also include compliance with OAC rule 3745-31-05(D), OAC rule 3745-21-07(M)(2), and 40 CFR Part 63 Subpart PPPP.

e. The options for compliance when using more than one type of coating is described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

f. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(a) - compliant material option. This is accomplished by demonstrating that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.4490, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, 63.4541, and 63.4542 to demonstrate compliance with the applicable emission limit using this option.

The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491; however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]

Note: The OC capture/control system for these emission units is not being used for compliance with Subpart PPPP at the time of permit processing. A performance test was conducted in June 2003 (for other rule requirements) - as of the time of permit processing, this test has not been evaluated with regard to conformance with Subpart PPPP.

g. Pursuant to OAC 3745-17-11(C)(3), these emissions units are exempt from the requirements of OAC rule 3745-17-11.

c) Operational Restrictions

(1) The permittee shall operate the waterwash system whenever this emissions unit is in operation.
[OAC rule 3745-77-07(A)(1) and PTI 03-13903]

(2) The maximum rolling 12-month usage rate of OC-containing materials for emissions units R012, R013, R014 and R015 combined is limited by the following equation:

$$\sum_{M=1n}^{12} \sum E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000} \leq 124.0$$

Where:
E_n= OC emissions from an individual material (tons OC emitted/month);
U_n= Total usage of the individual material (gallons of material/month);
V_n= OC content, as applied (pounds OC/gallon);
C_n= Capture efficiency (percent);
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring.
[OAC 3745-77-07(A)(1) and PTI 03-13903]

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP, including the following sections:

Subpart PPPP section	**Subpart PPPP requirement**
63.4492(b)	Requirement to meet the operating limits specified in Table 1 to this subpart.
63.4493(b)	Requirement to meet the work practice standards stated in (b)(1) through (b)(5), in order to minimize organic HAP emissions.
63.4500(a)(2)	Requirement to be in compliance with the emission limitations and operating limits except during periods of startup, shutdown, and malfunction. Requirement to be in compliance with the work practice standards at all times.
63.4500(b)	Requirement to always operate and maintain the affected source in accordance with 63.6(e)(1)(i).
63.4500(c)* * This requirement is applicable only if the oxidizer is being used for Subpart PPPP compliance.	Requirement to develop and implement a written startup, shutdown, and malfunction plan according to the provisions of 63.6(e)(3).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units R012, R013, R014 and R015, combined:

a. the name and identification number of each coating and cleanup material employed;

b. the quantity of each coating and cleanup material employed, in gallons;

c. the OC content of each coating and cleanup material, in pounds/gallon, as applied;

d. the OC emissions for each coating and cleanup material employed, in tons/month, calculated as follows:

$$\sum E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000}$$

Where:
E_n= OC emissions from an individual material (tons OC emitted/month);
U_n= Total usage of the individual material (gallons of material/month);
V_n= OC content, as applied (pounds OC/gallon);
C_n= Capture efficiency (percent);
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring.

e. the total OC emission rate for all coatings and cleanup materials employed, in tons/month, calculated as follows:

$$E_M = E_1 + E_2 + E_3 + ... + E_n$$

Where:
E_M = Monthly OC emissions, in tons/month
E_n = OC emissions from each coating and cleanup material [i.e. d)(1)d]; and,

f. the rolling, 12-month OC emission rate from emissions units R012, R013, R014 and R015, combined, calculated as follows:

$$E_T = EM_1 + EM_2 + EM_3 + ... + EM_{12}$$

Where:
E_T = Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions
E_M = Monthly OC emissions (tons/month).

[OAC 3745-77-07(C)(1) and PTI 03-13903]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began [i.e. any 3-hour blocks of time in deviation of the requirement of d)(3) below] and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. 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.
[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(3) The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

This value 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.
[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(4) The CAM plan for this emissions unit has been developed for volatile organic compounds. The CAM performance indicator for the thermal oxidizer controlling this emissions unit is the combustion temperature, which was established in accordance with performance testing. When the combustion temperature shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in

Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The oxidizer shall not be configured to have bypass capability.
[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(5) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment (e.g. calibration or replacement of the thermocouple every two years). The permittee shall maintain a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(6) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(7) The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.
[OAC 3745-77-07(C)(1) and PTI 03-13903]

(8) The permit to install for this emissions unit group 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: methyl isobutyl ketone (MIBK)
TLV (µg /m3):205,000
Maximum Hourly Emission Rate (lbs/hour): 15.0
Predicted 1-Hour Maximum Ground-Level Concentration (µg /m3): 671
MAGLC (µg /m3): 4880
[PTI 03-13903]

(9) 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 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.).

* Only compounds / pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

[PTI 03-13903]

(10) 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(QQQ)(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 (QQQ)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
[PTI 03-13903]

(11) 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 03-13903]

(12) 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.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedance of the maximum rolling 12-month usage rate of OC-containing material;

b. any exceedance of the rolling 12-month OC emission limitation for emissions units R012, R013, R014, and R015, combined;

c. any 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer does not comply with the temperature limitation specified in accordance with d)(3); and

d. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
[OAC 3745-15-03(B)(1)(a), OAC 3745-15-03(C), OAC 3745-77-07(A)(3)(c), OAC 3745-77-07(C)(1), and 40 CFR Part 64]

(2) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the waterwash system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-13903]

(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.

[OAC rule 3745-77-07(C)(1), PTI 03-13903, and 40 CFR Part 63, Subpart PPPP]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:
124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).
[OAC 3745-77-07(C)(1) and PTI 03-13903]

b. Emission Limitation:
10.30 pounds OC/hour - coating and cleanup (for each emissions unit)

Applicable Compliance Method:
Past compliance with the hourly OC limitations was demonstrated by emission testing conducted on June 10, 2003. If required, compliance with the hourly OC limitation shall be determined in accordance with Methods 1-4, 18 and 25 or 25A of 40 CFR Part 60, Appendix A.

[OAC 3745-77-07(C)(1) and PTI 03-13903]

c. Emission Limitation:
45.10 tons OC/year - coating and cleanup (for each emissions unit)

Applicable Compliance Method:
The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI 03-13903]

d. Emission Limitation:
0.28 pounds PE/hour and 1.23 tons PE/year (for each emissions unit)

Applicable Compliance Method:
The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (water curtain).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI 03-13903]

e. Emission Limitation:
Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
Ninety percent or more of the carbon in the organic material shall be incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:
Past compliance was demonstrated by emission testing conducted on June 10, 2003 If required, compliance with the control efficiency limitations shall be determined in accordance with Methods 1-4, 18 and 25 or 25A of 40 CFR Part 60, Appendix A, and Method 204, as specified in 40 CFR Part 51, Appendix M.
[OAC 3745-77-07(C)(1) and PTI 03-13903]

f. Emission Limitations:
For each existing 'general use' coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Applicable Compliance Method:
The permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR 63.4491, and 40 CFR 63.4540 through 40 CFR 63.4568.
[OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart PPPP]

g. Emission Limitation:
Visible PE shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.
[OAC 3745-77-07(C)(1) and PTI 03-13903]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of the coatings.

g) Miscellaneous Requirements

(1) None.