



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

3/3/2016

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204020245
Permit Number: P0120240
Permit Type: Initial Installation
County: Ashtabula

Certified Mail

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

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Continental Structural Plastics of Ohio LLC aka CSP OH

| | |
|----------------|----------------------|
| Facility ID: | 0204020245 |
| Permit Number: | P0120240 |
| Permit Type: | Initial Installation |
| Issued: | 3/3/2016 |
| Effective: | 3/3/2016 |



Division of Air Pollution Control
Permit-to-Install
for
Continental Structural Plastics of Ohio LLC aka CSP OH

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Authorization

Facility ID: 0204020245
Facility Description: Reinforced plastic composite parts manufacturing and painting
Application Number(s): A0055241
Permit Number: P0120240
Permit Description: Initial PTI for the installation of P047, compression mold press no. 27 for reinforced plastic composite parts.
Permit Type: Initial Installation
Permit Fee: \$500.00
Issue Date: 3/3/2016
Effective Date: 3/3/2016

This document constitutes issuance to:

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

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

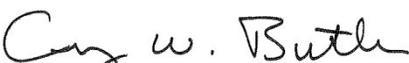
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120240

Permit Description: Initial PTI for the installation of P047, compression mold press no. 27 for reinforced plastic composite parts.

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

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | P047 |
| Company Equipment ID: | Press 27 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install
Continental Structural Plastics of Ohio LLC aka CSP OH
Permit Number: P0120240
Facility ID: 0204020245
Effective Date:3/3/2016

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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



18. Risk Management Plans

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

19. Title IV Provisions

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



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 emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production: P047. 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 at <http://www.ecfr.gov> or by contacting the Ohio EPA Northeast District Office.

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

3. Requirements of OAC rule 3745-21-25:

a) Volatile Organic Compound (VOC) control requirements:

(1) The permittee shall meet the work practice standards in Table 1 of OAC rule 3745-21-25.

(2) Currently, the facility has VOC emissions less than the threshold of 100 tons per year (TPY) from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, therefore the permittee shall meet the VOC emissions limits in Table 2 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.3.e).

(3) If the facility has VOC emissions equal to or greater than the threshold of 100 TPY from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing and BMC manufacturing, the permittee shall reduce the total VOC emissions from these operations by at least 95% by weight. As an alternative to meeting the 95% by weight reduction, the permittee may meet the VOC emissions limits in Table 3 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.3.e).

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

b) Recordkeeping Requirements:

(1) In accordance with OAC rule 3745-21-25(P)(1), the permittee shall keep the following records:

- (a) a copy of each applicability notification and compliance status report submitted to comply with this rule, including all documentation supporting any applicability or compliance status; and
 - (b) a certified statement that operations are in compliance with the work practice standards specified in Table 1 of the rule, as applicable.
- (2) In accordance with OAC rule 3745-21-25(P)(4), all records specified in section B.3.b)(1) shall be retained by the owner or operator for a period of not less than five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.
- c) Reporting Requirements:
- (1) In accordance with OAC rule 3745-21-25(Q)(1) and (Q)(3), the permittee shall submit semiannual compliance status reports containing the following information:
 - a. company name and address;
 - b. statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - c. date of the report and beginning and ending dates of the reporting period;
 - d. if there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in Table 1 of OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;
 - e. for each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs at an affected operation where a continuous monitoring system (CMS) is not used to comply with the VOC emissions limitation, operating, or work practice standard in OAC rule 3745-21-25, the compliance reports shall contain the following information:
 - i. The total operating time of each of the following operations during the reporting period:
 - (a) open molding;
 - (b) compression/injection molding;
 - (c) centrifugal casting;
 - (d) continuous lamination;
 - (e) continuous casting;
 - (f) polymer casting;

- (g) pultrusion;
 - (h) SMC manufacturing;
 - (i) BMC manufacturing;
 - (j) mixing;
 - (k) cleaning of equipment used in reinforced plastic composites manufacture;
 - (l) VOC-containing materials storage; and
 - (m) repair operations on reinforced plastic composite parts that are manufactured at the facility.
- ii. information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action(s) taken; and
- f. where multiple compliance options are available, the permittee shall state in this compliance report if the permittee has changed compliance options since the last compliance report.
- (2) The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each 6-month period to the Ohio EPA Northeast District Office. The first compliance report shall cover the period beginning on the compliance date that is specified in section B.3.d) and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date in section B.3.d). Each subsequent compliance report shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- (3) For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the permittee may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.
- (4) In accordance with OAC rule 3745-21-25(Q)(4), the permittee shall report if the facility exceeded the 100 TPY VOC emissions threshold if that exceedance would make the facility subject to OAC rule 3745-21-25(D)(3).
- (5) In accordance with OAC rule 3745-21-25(S)(1), the permittee of an affected operation shall notify the Ohio EPA Northeast District Office in writing that such operation is subject to OAC rule 3745-21-25. The notification, which shall be submitted no later than 60 days after December 14, 2009, shall provide the information specified in OAC rule 3745-21-25(S)(1). The initial notification of applicability with OAC rule 3745-21-25 was received on October 27, 2010.

- d) The compliance date for OAC rule 3745-21-25 requirements for this “existing facility” is December 14, 2009.
- e) Calculations of facility’s VOC emissions threshold:
- (1) In accordance with OAC rule 3745-21-25(F)(1), to calculate the facility’s VOC emissions threshold in TPY for the purpose of determining which requirements apply under OAC rule 3745-21-25(D), the permittee shall use the procedures in section B.3.e)(2). A facility’s VOC emissions threshold pertains to the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. For the facility’s VOC emissions threshold, calculate VOC emissions prior to any add-on control device, and do not include VOC emissions from any resin or gel coat used in operations subject to the boat manufacturing NESHAP, 40 CFR Part 63, Subpart VVVV, or from the manufacture of large parts as defined in OAC rule 3745-21-25(D)(4).
 - (2) In accordance with OAC rule 3745-21-25(F)(3), the permittee may use the procedures in either section B.3.e)(2)a. or section B.3.e)(2)b. for the operations specified in section B.3.e)(1). If the emission factors for this facility have changed over the period of time prior to its initial compliance date due to incorporation of pollution-prevention control techniques, the facility may base the average emission factor on its operations as they exist on the compliance date. If the facility has accepted an enforceable permit limit that would result in less than 100 TPY (per rolling, 12-month period) of VOC measured prior to any add-on controls, and can demonstrate that it will operate at that level subsequent to the compliance date, it can be deemed to be below the 100 TPY threshold.
 - a. Use a calculated emission factor

Calculate a weighted average VOC emissions factor on a pounds per ton of resin, monomer, or gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average VOC emissions factor by resin, monomer, or gel coat use over the same period. The permittee may calculate this VOC emissions factor based on the equations in Table 1 to Subpart WWWW of 40 CFR Part 63, or the permittee may use any VOC emission factor approved by USEPA, such as emission factors or emission factor equations from AP-42, or site-specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emission factors in Table 1 to Subpart WWWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this rule.
 - b. Conduct performance testing

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



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- (3) Calculations should cover the periods in the semiannual compliance reports.



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C. Emissions Unit Terms and Conditions

1. P047, Press 27

Operations, Property and/or Equipment Description:

Compression mold press no. 27 for reinforced plastic composite parts, capable of processing 1155 pounds of SMC per hour

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. | ORC 3704.03(T) | The requirements of this law also include compliance with the requirements of OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW. |
| b. | OAC rule 3745-21-25 | The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1). |
| c. | 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935) | Work practice standards in Table 4 of Subpart WWWW. See c)(1). |
| d. | 40 CFR 63.1 – 63.15 | The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

to fill the hopper. Hoppers shall be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials shall be recovered after slitting.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the company identification of each mold compound used;
- b. the weight, in pounds, of each mold compound used;
- c. the total Organic Compound (OC) emissions rate for all mold compounds used, in pounds per day, calculated as specified:

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

where:

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

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

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

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

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

- a. whether the emissions unit was in operation;
- b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and
- c. information on the duration and cause of each deviation and the corrective action(s) taken.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit semiannual compliance reports.
 - a. If there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of those work practice standards during the reporting period (i.e., uncover, unwrap, or expose only one charge per mold cycle per compression/injection molding machine).
 - b. If there were deviations from the work practice standards in c)(1), provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
None.

g) Miscellaneous Requirements

- (1) None.