Ohio Environmental Protection Agency

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

9/6/2016

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Continental Structural Plastics
Facility ID: 0381020017
Permit Type: Renewal
Permit Number: P0120321

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. 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. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office

PROPOSED

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

Facility ID:	0381020017
Permit Number:	P0120321
Permit Type:	Renewal
Issued:	9/6/2016
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

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Authorization

Facility ID:	0381020017
Facility Description:	Custom Compound Purchased Resins
Application Number(s):	A0055319
Permit Number:	P0120321
Permit Description:	Renewal Title V operating permit for a structural plastics manufacturing facility.
Permit Type:	Renewal
Issue Date:	9/6/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087752

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

Continental Structural Plastics
1276 Industrial Drive
Van Wert, OH 45891-2466

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 Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to 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 Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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

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

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

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

28. Permit Transfers

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

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

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

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

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

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

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

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

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event 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. This facility is subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production. 40 CFR Part 63, Subpart WWWW applies to all parts of the facility engaged in the following operations: casting, pultrusion, sheet molding compound manufacturing, bulk molding compound manufacturing, mixing, cleaning of equipment used in reinforced plastic composite manufacture, HAP-containing materials storage, and repair operations on parts manufactured [see 63.5790(c) for exclusions]. The following non-insignificant emissions units contained in this permit are subject to MACT Subpart WWWW: P001, P002, P005, P006, P007, P008, P009, P010, P011, and P013.

   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. The complete MACT requirements, including the MACT General Provisions (Subpart A) 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.

   [Authority for term: 40 CFR Part 63, Subpart WWWW]

3. Insignificant emissions units P016, P017, P018 and P024, listed below, are subject to 40 CFR Part 63, Subpart WWWW. The applicable requirements of this rule are summarized below:

   a) Pursuant to 40 CFR Part 63.5805(a), emissions units P016, P017, P018 and P024 shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, 7, and 8 - For an existing or new mixing or BMC manufacturing operation:

      (1) Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;

      (2) Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and

      (3) Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

   b) Pursuant to 40 CFR Part 63.5860(a), the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Items #6, 7, and 8 - For an existing or new mixing or BMC manufacturing operation, are applicable to emissions units P016, P017, P018 and P024.

   c) Pursuant to 63.5905(a), the requirement in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item #1, is applicable to emissions units P016, P017, P018 and P024.

d) Pursuant to 63.5910, the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Item #1, are applicable to emissions units P016, P017, P018 and P024.

[Authority for term: 40 CFR Part 63, Subpart WWWW]

4. Insignificant emissions units T001 through T014, listed below, are subject to 40 CFR Part 63, Subpart WWWW. The applicable requirements of this rule are summarized below:

a) Pursuant to 40 CFR Part 63.5805(a), emissions units T001 through T014 shall meet the requirement stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Item #3 - For a new or existing HAP-containing materials storage operation:

(1) Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

b) Pursuant to 40 CFR Part 63.5860(a), the requirement stated in Table 9 to Subpart WWWW of Part 63, Initial Compliance with Work Practice Standards, Item #3, for a new or existing HAP containing materials storage operation, is applicable to emissions units P016, P017, P018, and P024.

c) Pursuant to 63.5905(a), the requirement in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item #1, is applicable to emissions units T001 through T014.

d) Pursuant to 63.5910, the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Item #1, are applicable to emissions units T001 through T014.

[Authority for term: 40 CFR Part 63, Subpart WWWW]

5. 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 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.

The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility's boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575. The complete MACT requirements, including the MACT General Provisions (Subpart A) 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 following insignificant emissions units are boilers designed to only burn gas 1 fuels (subcategory) and therefore are not subject to the emission limits in Table 2 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
B004	Clever Brooks 2,929,000 BTU/Hour input
B005	Clever Brooks 2,929,000 BTU/Hour input

[Authority for term: 40 CFR Part 63, Subpart DDDDD]

6. 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
B004	Clever Brooks 2,929,000 BTU/Hour input
B005	Clever Brooks 2,929,000 BTU/Hour input
P003	calcium carbonate silos #1 and #2, raw material unloading and storage (PTI #03-8924)
P016	A-Side paste mixer #1
P017	A-Side paste mixer #2
P018	B-Side paste mixer #1
P024	A-Side paste mixer #3
T001	Resin storage tank #1
T002	Resin storage tank #2
T003	Resin storage tank #3
T004	Resin Storage Tank #4
T005	Resin Storage Tank #5
T006	Resin storage tank #6
T007	Resin storage tank #7
T008	Resin storage tank #8
T009	Resin storage tank #9
T010	Resin storage tank #10
T011	Resin storage tank #11
T012	Resin storage tank #12 (PTI #03-9723)
T013	Resin storage tank #13 (PTI #03-9723)
T014	Resin storage tank #14 (PTI #03-9723)

[Authority for term: OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. P011, Cleaning Solvent Use

Operations, Property and/or Equipment Description:

Use of cleaning solvent at the facility

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

(1) 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) (PTI #03-10787, issued 03-18-1998)	2000 lbs organic compounds (OC)/month, and 12 tons OC/year
b.	OAC rule 3745-21-25	The permittee shall comply with the work practice standards identified in Table 1 to OAC rule 3745-21-25. See c)(1).
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a cleaning operation at an existing SMC manufacturing facility, subject to the work practice standards specified in this section.]	The permittee shall comply with the work practice standards identified in Table 4 to 40 CFR 63, Subpart WWWW. See c)(2).
d.	40 CFR 63.1-15 (40 CFR 63.5925)	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. None.

c) Operational Restrictions

(1) The permittee shall not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and/or used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

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

(2) The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. The company identification of each cleanup material employed;

b. The number of gallons of each cleanup material employed;

c. The OC content of each cleanup material employed, in pounds per gallon;

d. The total OC emissions for all cleanup materials employed [i.e., the sum of d)(1)b. x d)(1)c. for each cleanup material employed], in pounds;

e. The amount, in pounds, of all waste cleanup materials (excluding solids) sent off site for disposal/reclamation; and

f. The net OC emissions for all cleanup materials [d)(1)d. – d)(1)e.], in pounds.

Note: If waste cleanup material is sent of site on a quarterly basis, the company may back calculate the monthly gallons sent off site by dividing the quarterly amount by three.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

(2) The permittee shall collect and record the annual OC emissions from cleanup, in tons, each year for this emissions unit [the permittee shall calculate the annual OC emissions by summing the monthly OC emissions from d)(1)f. for the calendar year].

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

(3) In accordance with 40 CFR Part 63.5915, the permittee shall keep a certified statement that the permittee is in compliance with the work practice requirements specified in section c)(1).

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

e) Reporting Requirements

(1) The permittee shall submit semi-annual deviation (excursion) reports for any deviations of the work practice standards specified in section c)(1) in accordance with 40 CFR Part 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW, and in accordance with OAC 3745-21-25(Q).

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

(2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the monthly OC emission limitation of 2000 pounds.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

(3) The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

2000 lbs organic compounds (OC)/month

<u>Applicable Compliance Method:</u>

The permittee shall demonstrate compliance with the monthly allowable OC emissions limitation through the recordkeeping requirements in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

b. <u>Emission Limitation</u>:

12 tons OC/year

<u>Applicable Compliance Method:</u>

The permittee shall demonstrate compliance with the annual allowable OC emissions limitation through the recordkeeping requirements in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Group A - SMC Machines 1 - 3: P001, P002, P009,

EU ID	Operations, Property and/or Equipment Description
P001	Sheet Molding Compound (SMC) manufacturing #1
P002	Sheet Molding Compound (SMC) manufacturing #2
P009	Sheet Molding Compound (SMC) manufacturing #3

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 11/30/01 (PTI #P0105926, issued 05-04-10)	Emissions of volatile organic compounds (VOC) shall not exceed 14.0 tons per rolling, 12-month period, from each SMC machine (excluding scrap SMC) Emissions of VOC shall not exceed 40.0 tons per rolling, 12-month period, from emission units P001, P002, and P009 combined, associated with the generation, analysis, and disposal of scrap SMC [See b)(2)b.] See b)(2)a.
b.	OAC rule 3745-21-25	Work Practice Standards [See c)(1)]
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780-5935) [In accordance with 40 CFR Part 63.5795(b) and 63.5935, these emissions units sheet molding compound (SMC) manufacturing operations at an existing SMC manufacturing facility, subject to the work practice standards specified in this section.]	Work Practice Standards [See c)(1)]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR 63.1-15 (40 CFR 63. 5925)	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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01, for this emissions unit have been determined to be the use of resins which meet the VOC emission limitations of 14.0 tons (associated with the SMC machine, excluding scrap) and 40.0 tons (associated with scrap SMC) per rolling, 12-month periods, and the work practice standards specified in 40 CFR Part 63 Subpart WWW and OAC rule 3745-21-25.

b. Scrap SMC shall be defined as all SMC generated that is not considered a useable product and has not been encapsulated in a plastic film.

c) Operational Restrictions

(1) The permittee shall comply with the following work practice standards specified in 40 CFR, Part 63, Subpart WWWW, Table 4, and OAC rule 3745-21-25, Table 1:

a. Close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.

b. Use a nylon containing film to enclose SMC.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, PTI # P0105926 and 40 CFR, Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) Within fifteen days after the end of each month, the permittee shall collect and record the following information for each emissions unit:

a. the amount of SMC produced for each type of SMC product, excluding scrap, in tons.

b. the monomer content of each SMC product, in weight %;

c. the VOC emission factor for each SMC product, in lbs VOC per ton of SMC product (The permittee shall determine the emission factors in accordance with the requirements specified in OAC 3745-21-25(E), and maintain records of all data, assumptions, and calculations used to determine the monomer contents and VOC emissions factors.);

d. the VOC emissions for each SMC product, excluding scrap [d)(1)a. x d)(1)c.], in tons;

e. the VOC emissions for all SMC products, excluding scrap [summation of d)(1)d.], in tons; and

f. the annual VOC emissions, for all SMC products, excluding scrap, in tons, based on a rolling, 12-month summation of the monthly emissions. (This emissions unit has been in operation for more than 12 months, and as such has the necessary records to immediately begin maintaining the rolling, 12-month summation upon the issuance of this permit).

[OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, PTI #P0105926 and 40 CFR, Part 63, Subpart WWWW]

(2) Within fifteen days after the end of each month, the permittee shall collect and record the following information each month from emission units P001, P002, and P009, combined:

a. the amount of scrap SMC produced for each type of SMC product, in tons;

b. the VOC emission factor for each scrap SMC product, in lbs VOC per ton of scrap SMC product (The permittee maintain records of all data, assumptions, and calculations used to determine the monomer contents and VOC emissions factors.);

c. the VOC emissions for each scrap SMC product [d)(2)a. x d)(2)c., in tons;

d. the VOC emissions for all scrap SMC products [summation of d)(2)d.], in tons; and

e. the annual VOC emissions, for all scrap SMC products, in tons, based on a rolling, 12-month summation of the monthly emissions. (These emissions units have been in operation for more than 12 months, and as such have the necessary records to immediately begin maintaining the rolling, 12-month summation upon the issuance of this permit).

[OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, PTI #P0105926 and 40 CFR, Part 63, Subpart WWWW]

(3) In accordance with 40 CFR Part 63.5915, the permittee shall keep a certified statement that you are in compliance with the work practice requirements specified in section c)(1).

[OAC rule 3745-77-07(A)(1), PTI #P0105926 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit semi-annual deviation (excursion) reports for any deviations of the work practice standards specified in section c)(1) in accordance with 40 CFR Part 63.5910(b) and OAC rule 3745-21-25(Q).

[OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, PTI #P0105926 and 40 CFR, Part 63, Subpart WWWW]

(2) The permittee shall submit quarterly deviation (excursion) reports for any deviations of the rolling, 12 month emission limitations in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(A)(1), and PTI #P0105926]

(3) In accordance with OAC rule 3745-21-25(P)(3), the permittee shall submit a report if any record indicates any emissions unit exceeds the rolling, 12 month emissions exemption specified in OAC rule 3745-21-25(D)(9). This report shall be submitted within 45 days after the exceedance has occurred.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, and PTI #P0105926]

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

14.0 tons of VOC per rolling, 12-month period from each SMC Machine

<u>Applicable Compliance Method:</u>

Compliance with the VOC limitation shall be based on the record keeping requirements specified in section d)(1).

[OAC rule 3745-77-07(A)(1) and PTI #P0105926]

b. <u>Emission Limitation</u>:

40.0 tons of VOC per rolling, 12-month period from emissions units P001, P002, and P009, combined, associated with the generation, analysis, and disposal of scrap SMC

<u>Applicable Compliance Method:</u>

Compliance with the VOC limitation shall be based on the record keeping requirements specified in section d)(2).

[OAC rule 3745-77-07(A)(1) and PTI #P0105926]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Group B - Resin Mix Tanks 1 - 4: P005, P006, P007, P010,

EU ID	Operations, Property and/or Equipment Description
P005	Blending of resin solids with styrene
P006	Blending of resin solids with styrene
P007	Blending of resin solids with styrene
P010	Blending of resin solids with styrene

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) [For emissions units P005, P006, and P007: PTI #03-08924, issued 02-28-1996; and for emissions unit P010: PTI #03-10232, issued 03-12-1997]	See b)(2)a.
b.	OAC rule 3745-21-25	The permittee shall comply with the work practice standards identified in Table 1 to OAC rule 3745-21-25. See c)(1).
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a resin mixing operation at an existing SMC manufacturing facility, subject to the work practice standards specified in this section.]	The permittee shall comply with the work practice standards identified in Table 4 to 40 CFR 63, Subpart WWWW. See c)(1).
d.	40 CFR 63.1-15 (40 CFR 63. 5925)	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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-25 and 40 CFR, Part 63, Subpart WWWW.

c) Operational Restrictions

(1) The permittee shall comply with the following work practice standards specified in 40 CFR, Part 63, Subpart WWWW, Table 4, and OAC rule 3745-21-25, Table 1:

a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;

b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and

c. Keep the mixer covers closed while actual missing is occurring except when adding materials or changing covers to the mixing vessels.

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

d) Monitoring and/or Recordkeeping Requirements

(1) In accordance with 40 CFR Part 63.5915, the permittee shall keep a certified statement that you are in compliance with the work practice requirements specified in section c)(1).

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

e) Reporting Requirements

(1) The permittee shall submit semi-annual deviation (excursion) reports for any deviations of the work practice standards specified in section c)(1) in accordance with 40 CFR Part 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW, and in accordance with OAC rule 3745-21-25(Q).

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

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Group C - Cowles Mixers 1 & 2: P008 and P013

EU ID	Operations, Property and/or Equipment Description
P008	Cowles Mixer
P013	Cowles Mixer

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

(1) 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) (For emissions units P008: PTI #03-08924, issued 02-28-1996)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) (for emissions unit P013: PTI #03-10787, issued 03-18-1998)	2.0 lbs organic compounds (OC)/hr, and 40 lbs OC/day, and 7.3 tons OC/yr from emissions unit P013
c.	OAC rule 3745-21-25	The permittee shall comply with the work practice standards identified in Table 1 to OAC rule 3745-21-25. See c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a resin mixing operation at an existing SMC manufacturing facility, subject to the work practice standards specified in this section.]	The permittee shall comply with the work practice standards identified in Table 4 to 40 CFR 63, Subpart WWWW. See c)(1).
e.	40 CFR 63.1-15 (40 CFR 63. 5925)	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 established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-25 and 40 CFR, Part 63, Subpart WWWW.

c) Operational Restrictions

(1) The permittee shall comply with the following work practice standards specified in 40 CFR, Part 63, Subpart WWWW, Table 4, and OAC rule 3745-21-25, Table 1:

a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;

b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and

c. Keep the mixer covers closed while actual missing is occurring except when adding materials or changing covers to the mixing vessels.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for emissions unit P013:

a. The company identification of each product and each batch produced;

b. The total duration of each batch, including the start and stop time of each batch (see note below);

c. The weight, in tons, of each product produced;

d. The weight, in tons, of all the products produced;

e. The total OC emissions from all the products produced, in pounds [E lbs OC/ton of product]* x [weight of all products, from d)(1)d.];

f. the number of hours the emissions unit was in operation; and

g. the average hourly OC emission rate [d)(1)e./d)(1)f.], in pounds per hour (average).

*Where E = 6.0 for misc. pastes and E = 10.0 for “B-side” pastes. This emission factor is based on information supplied by the permittee.

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be

proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

(2) The permittee shall calculate and record the total annual OC emissions from emissions unit P013 [i.e., the sum of the daily OC emission rates for the calendar year in d)(1)e.]

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

(3) In accordance with 40 CFR Part 63.5915, the permittee shall keep a certified statement that you are in compliance with the work practice requirements specified in section c)(1).

[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, in accordance with the Standard Terms and Conditions of this permit, that include the following information:

a. An identification of each day during which the hourly OC emissions exceeded 2.0 pounds per hour, and the actual hourly OC emissions for each such day.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

(2) The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

(3) The permittee shall submit semi-annual deviation (excursion) reports for any deviations of the work practice standards specified in section c)(1) in accordance with 40 CFR Part 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW, and in accordance with OAC rule 3745-21-25(Q).

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

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

2.0 lbs OC/hr from emissions unit P013

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly OC emission limitation through the recordkeeping requirements in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

b. Emission Limitation:

7.3 tons OC/yr from emissions unit P013

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC limitation through the recordkeeping requirements in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-10787]

g) Miscellaneous Requirements

(1) None.